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	· ago i
1	IN THE UNITED STATES DISTRICT COURT
2	FOR THE WESTERN DISTRICT OF LOUISIANA
3	MONROE DIVISION
4	x
5	STATE OF MISSOURI ex rel.,:
6	ERIC S. SCHMITT, Attorney:
7	General, STATE OF :
8	LOUISIANA ex rel. JEFFREY :
9	M. LANDRY, Attorney :
10	General, DR. JAYANTA :
11	BHATTACHARYA, JILL HINES, :
12	JIM HOFT, DR. AARON :
13	KHERIATY, and DR. MARTIN :
14	KULLDORFF, :
15	Plaintiffs, : No.
16	v. : 3:22-cv-01213-TAD-KDM
17	JOSEPH R. BIDEN, JR., in :
18	his official capacity as :
19	President of the United :
20	States; :
21	KARINE JEAN-PIERRE in her :
22	Official capacity as White:
23	House Press Secretary; :
24	VIVEK H. MURTHY, in his :
25	Official capacity of :

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1	Surgeon General of the	:	
2	United States;	:	
3	XAVIER BECERRA, in his	:	
4	Official capacity as	:	
5	Secretary of the	:	
6	Department of Health and	:	
7	Human Services;	:	
8	DEPARTMENT OF HEALTH AND	:	
9	HUMAN SERVICES;	:	
10	DR. ANTHONY FAUCI, in his	:	
11	Official capacity as	:	
12	Director of the National	:	
13	Institute of Allergy and	:	
14	Infectious Diseases and a	s:	
15	Chief Medical Advisor to	:	
16	the President;	:	
17	NATIONAL INSTITUTE OF	:	
18	ALLERGY AND INFECTIOUS	:	
19	DISEASES;	:	
20	CENTERS FOR DISEASE	:	No.
21	CONTROL AND PREVENTION;	:	3:22-cv-01213-TAD-KDM
22	CAROL Y. CRAWFORD, in her	:	
23	Official capacity as Chie	f:	
24	of the Digital Media	:	
25	Branch of the Division of	:	

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1	Public Affairs within the		
2	Centers for Disease		
3	Control and Prevention;		
4	UNITED STATES CENSUS		
5	BUREAU, a.k.a. BUREAU OF	•	
6	THE CENSUS;	:	
7	JENNIFER SHOPKORN, in her		
8	Official capacity as	:	
9	Senior Advisor for	:	
10	Communications with the	:	
11	U.S. Census Bureau;	:	
12	DEPARTMENT OF COMMERCE;	:	
13	ALEJANDRO MAYORKAS, in his	s:	
14	Official capacity as	:	
15	Secretary of the	:	
16	Department of Homeland	:	
17	Security;	:	
18	ROBERT SILVERS, in his	:	
19	Official capacity as Under	r:	
20	Secretary of the Office of	f:	
21	Strategy, Policy, and	:	
22	Plans, within DHS;	:	
23	SAMANTHA VINOGRAD, in her	:	
24	Official capacity as	:	
25	Senior Counselor for	:	

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1	National Security in the	:
2	Office of the Secretary	
3	For DHS;	:
4	DEPARTMENT OF HOMELAND	:
5	SECURITY;	:
6	JEN EASTERLY, in her	:
7	Official capacity as	:
8	Director of the	:
9	Cybersecurity and	:
10	Infrastructure Security	:
11	Agency;	:
12	CYBERSECURITY AND	:
13	INFRASTRUCTURE SECURITY	:
14	AGENCY;	:
15	GINA McCARTHY, in her	:
16	Official capacity as Whi	te:
17	House National Climate	:
18	Advisor, and	:
19	NINA JANKOWICZ, in her	:
20	Official capacity as	:
21	Director of the so-calle	d :
22	"Disinformation Governan	ce:
23	Board" within the	:
24	Department of Homeland	:
25	Security,	:

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1	ANDREW SLAVITT, in his	:
2	Official capacity as White	
3	House Senior COVID-10	:
4	Advisor,	:
5	ROB FLAHERTY, in his	:
6	Official capacity as	:
7	Deputy Assistant to the	:
8	President and Director of	:
9	Digital Strategy at the	:
LO	White House,	:
L1	COURTNEY ROWE, in her	:
L2	Official capacity as White	e:
L3	House Covid-19 Director of	f:
L 4	Strategic Communications	:
L 5	And Engagement,	:
L 6	CLARKE HUMPHREY, in her	:
L7	Official capacity as White	e:
L8	House Digital Director for	r:
L9	the Covid-19 Response	:
20	Team,	:
21	BENJAMIN WAKANA, in his	:
22	Official capacity as the	:
23	Deputy Director of	:
24	Strategic Communications	:
25	And Engagement at the	:

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1	LAURA ROSENBERGER, in her	·
2	Official capacity as	:
3	Special Assistant to the	:
4	President,	:
5	MINA HSIANG, in her	:
6	Official capacity as	:
7	Administrator of the U.S.	. :
8	Digital Service within th	ne:
9	Office of Management and	:
10	Budget in the Executive	:
11	Office of the President,	:
12	U.S. DEPARTMENT OF	:
13	JUSTICE, FEDERAL BUREAU C)F:
14	INVESTIGATION,	:
15	LAURA DEHMLOW, in her	:
16	Official capacity as	:
17	Section Chief for the	:
18	FBI's Foreign Influence	:
19	Task Force,	:
20	ELVIS M. CHAN, in his	:
21	Official capacity as	:
22	Supervisory Special Agent	: :
23	of Squad CY1 in the San	:
24	Francisco Division of the	:
25	Federal Bureau of	:

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1	Investigation,		
2	JAY DEMPSEY, in his	•	
3	Official capacity as		
4			
	Social Media Team Lead,		
5	Digital Media Branch,		
6	Division of Public Affai	rs:	
7	at the CDC,	:	
8	KATE GALATAS, in her		
9	Official capacity as		
10	Deputy Communications	:	
11	Director at the CDC,	:	
12	ERIC WALDO, in his	:	
13	Official capacity as	:	
14	Chief Engagement Officer	:	
15	For the Surgeon General,	:	
16	YOLANDA BYRD, in her	:	
17	Official capacity as a	:	
18	Member of the Digital	:	
19	Engagement Team at HHS,	:	
20	CHRISTY CHOI, in her	:	
21	Official capacity as	:	
22	Deputy Director, Office	of:	
23	Communications, HRSA	:	
24	within HHS,	:	
25	TERICKA LAMBERT, in her	:	
4 0	iekicka lambekt, in ner	•	

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1	Official capacity as	
2	Director of Digital	•
3	Engagement at HHS and	•
4	Deputy Director of the	
5	Office of Digital Strateg	
6	at the White House,	·
7	JOSHUA PECK, in his	•
8	Official capacity as	•
9	Deputy Assistant Secretar	•
10	for Public Engagement at	_
11	HHS,	•
12	JANELL MUHAMMED, in her	•
13	Official capacity as	
		. + .
14	Deputy Digital Director a	. L :
15	HHS,	:
16	MATTHEW MASTERSON, in his	:
17	Official capacity as	:
18	Senior Cybersecurity	:
19	Advisory within CISA in	:
20	the Department of	:
21	Homeland Security,	:
22	LAUREN PROTENTIS, in her	:
23	Official capacity as an	:
24	official of CISA,	:
25	GEOFFREY HALE, in his	:

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1	Official capacity as an	
2	Official of CISA,	:
3	ALLISON SNELL, in her	:
4	Official capacity as an	:
5	Official of CISA,	:
6	KIM WYMAN, in her official	L:
7	Capacity as CISA's Senior	
8	Election Security Lead,	
9	BRIAN SCULLY, in his	:
10	Official capacity as an	:
11	Official of DHS and CISA,	
12	ZACHARY HENRY SCHWARTZ, ir	1:
13	his official capacity as	:
14	Division Chief for the	
15	Communications Directorate	∋:
16	at the U.S. Census Bureau,	· :
17	LORENA MOLINA-IRIZARRY, ir	า:
18	her official capacity as	:
19	an official of the Census	:
20	Bureau,	:
21	KRISTIN GALEMORE, in her	:
22	Official capacity as	:
23	Deputy Director of the	:
24	Office of Faith Based and	:
25	Neighborhood Partnerships	:
1		

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1		
1		
1	at the Census Bureau,	:
2	U.S. FOOD AND DRUG	:
3	ADMINISTRATION,	:
4	ERICA JEFFERSON, in her	:
5	Official capacity as	:
6	Associate Commissioner fo	or:
7	External Affairs within	:
8	the Office of the	:
9	Commissioner at the U.S.	:
10	Food and Drug	:
11	Administration,	:
12	MICHAEL MURRAY, in his	:
13	Official capacity as	:
14	Acquisition Strategy	:
15	Program Manager for the	:
16	Office of Health	:
17	Communications and	:
18	Education at the FDA,	:
19	BRAD KIMBERLY, in his	:
20	Official capacity as	:
21	Director of Social Media	:
22	at the FDA,	:
23	U.S. DEPARTMENT OF STATE,	:
24	LEAH BRAY, in her officia	al:
25	capacity as Acting	:

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1	Coordinator of the State	
2	Department's Global	
3	Engagement Center,	•
4	SAMARUDDIN K. STEWART, in	•
5	His official capacity as	
6	Senior Technical Advisor	
7	and/or Senior Advisor for	•
8	the Global Engagement	•
9	Center of the State	:
10	Department,	:
11	DANIEL KIMMAGE, in his	
12	official capacity as	
13	Acting Coordinator for the	e:
14	Global Engagement Center	:
15	at the State Department,	:
16	ALEXIS FRISBIE, in her	:
17	official capacity as a	:
18	member of the Technology	:
19	Engagement Team at the	:
20	Global Engagement Center	:
21	at the State Department,	:
22	U.S. DEPARTMENT OF	:
23	TREASURY,	:
24	WALLY ADEYEMO, in his	:
25	Official capacity as	•

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	1 495 15
1	Deputy Secretary of the :
2	Treasury, :
3	U.S. ELECTION ASSISTANCE :
4	COMMISSION, :
5	MARK A. ROBBINS, in his :
6	Official capacity as :
7	Interim Executive Director:
8	of the EAC, and :
9	KRISTEN MUTHIG, in her :
10	Official capacity as :
11	Director of Communications:
12	for the EAC, :
13	Defendants. :
14	x
15	
16	Videotaped Deposition of DANIEL KIMMAGE
17	Thursday, November 10, 2022
18	10:04 a.m.
19	
20	
21	Job No.: 135884
22	Pages 1 through 304
23	Reported by: Cassandra E. Ellis, RPR
24	
25	

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1	Deposition of DANIEL KIMMAGE, held
2	pursuant to agreement, before Cassandra E. Ellis,
3	Certified Shorthand Reporter Hawaii #475,
4	Certified Court Reporter - Washington #3484,
5	Certified Shorthand Reporter - California -
6	#14448, Registered Professional Reporter #823848,
7	Certified Realtime Reporter, Realtime Systems
8	Administrator, and Notary Public of The District
9	of Columbia.
10	
11	
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	. 490 10
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2	ON BEHALF OF PLAINTIFF:
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11	
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15	AMANDA CHUZI, ESQUIRE
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1	APPEARANCES CONTINUED
2	ON BEHALF OF NEW CIVIL LIBERTIES ALLIANCE:
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13	ON BEHALF OF U.S. DEPARTMENT OF STATE:
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19	(202) 632-9254
20	Shahma@state.gov
21	
22	
23	ALSO PRESENT:
24	Joseph E. Ellis, Certified Legal Video Specialist
25	

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1	PROCEEDINGS
2	THE VIDEOGRAPHER: Good morning.
3	This is the beginning of the media in the
4	deposition of Daniel Kimmage taken in the matter
5	of the State of Missouri, et al., plaintiffs
6	versus Joseph R. Biden, Junior, et al.,
7	defendants, with a Case Number
8	3:22-CV-01213-TAD-KDM, held in the United States
9	District Court for the Western District of
10	Louisiana, Monroe division.
11	Today's date is November 10th,
12	2022, and the time on the monitor is
13	approximately 10:04 a.m.
14	My name is Joseph Ellis. I'm the
15	certified legal videographer. The court
16	reporter is Cassandra Ellis. And we are here
17	representing Lexitas Deposition Services.
18	Counsel appearances will be noted
19	on the stenographic record, only.
20	Will the court reporter please
21	swear in the witness, then you may proceed.
22	///
23	///
24	///
25	///

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1	DANIEL KIMMAGE
2	having been duly sworn, testified as follows:
3	EXAMINATION
4	BY MR. SAUER:
5	Q. Could you please state your name,
6	for the record?
7	A. Daniel Kimmage.
8	Q. And Mr. Kimmage, what's your
9	current title?
10	MR. KIRSCHNER: Mr. Sauer, I just
11	wanted to put something on the record before we
12	got started, just before you start going into
13	the to the basics.
14	I just wanted to put on the record
15	that yesterday, November 9th, 2022, the
16	defendants moved for a protective order
17	concerning this deposition, and other
18	depositions, to protect the related to the
19	dissemination of the video of the deposition,
20	and also related to certain personal information
21	that may be discussed at the deposition.
22	Yesterday today, in docket entry
23	111, the Court temporarily granted that motion
24	to allow for the briefing of this issue, and we
25	ask that plaintiffs abide by that order.

1	MR. SAUER: Plaintiffs will abide
2	by that order, and will respond to the motion in
3	due course on the Court's briefing schedule.
4	BY MR. SAUER:
5	Q. Mr. Kimmage, what's your current
6	title?
7	A. My title is principal deputy
8	coordinator of the Global Engagement Center.
9	Q. And at various times you've been
10	acting coordinator as well as principal deputy
11	coordinator of that; is that right?
12	A. Yes.
13	Q. How long have you been at the
14	Global Engagement Center for the State
15	Department?
16	A. Since January, I think January
17	21st, 2017.
18	Q. Let me ask you this: Have you ever
19	been deposed before?
20	A. No.
21	Q. So can I just go through some
22	ground rule type questions?
23	A. Sure.
24	Q. One thing is when I ask a question
25	could you wait until I finish the question

1	before you respond?
2	A. Mm-hmm. Yes.
3	Q. Next thing is, could you give an
4	oral response to all my questions, because the
5	court reporter is transcribing, so a nod doesn't
6	come across, necessarily, in the transcripts,
7	can you give an oral response to all my
8	questions?
9	A. Yes.
10	Q. And I'm a bad offender at this, but
11	can you and I be careful not to interrupt each
12	other?
13	A. Yes.
14	Q. And if at any time, I would like
15	you to listen carefully to the question that I'm
16	asking and answer the question that I'm asking,
17	as we go forward, are you willing to do that?
18	A. Yes.
19	Q. And if at any time you don't
20	understand the question, could you ask me for
21	clarification rather than answer a question that
22	you're not sure that I asked?
23	A. Yes.
24	Q. Okay. So you've been at the Global
25	Engagement Center for about five years; is that

1	
1	fair to say, beginning of 2017?
2	A. Since January 21st, 2017, with
3	with breaks.
4	Q. And prior to that, and breaks
5	include a stint at the National Defense
6	University, that was fairly recent; is that
7	right?
8	A. Yes.
9	Q. How how recently did you come
10	back to the Global Engagement Center from the
11	National Defense University?
12	A. In July 2022, July of this year.
13	Q. And that was a 10-month stint, you
14	were away for 10 months at that university?
15	A. Yes.
16	Q. And you've been back for about four
17	months, since then?
18	A. Yes.
19	Q. I may ask you other things today,
20	about stuff that may have happened while you
21	were gone, in which case I'm just asking you to
22	respond to the best of your knowledge; is that
23	fair to say?
24	A. Yeah.
25	Q. Okay. Other than that 10-month

1	period, were there other periods where you were
2	not at the Global Engagement Center?
3	A. Before January 21st, 2017, I was in
4	the Office of Policy Planning.
5	Q. But between January 1st, 2017 and
6	now, other than the 10-month interruption at the
7	NDU, you've been continuously at the Global
8	Engagement Center?
9	A. Yes.
10	Q. And during that time period, you've
11	been in a senior role, either as acting
12	coordinator or a principal deputy coordinator;
13	fair to say?
14	A. Correct.
15	Q. And I take it the difference
16	between those two, executive coordinator is
17	the coordinator a senate-confirmed position?
18	A. It is not.
19	Q. Well, let me ask this: Can you
20	describe, generally, what the Global Engagement
21	Center does?
22	A. The Global Engagement Center has a
23	congressional mandate, it comes from the 2017
24	National Defense Authorization Act to direct and
25	lead the US government's efforts to counter

1	foreign propaganda and disinformation.
2	Q. Is the word disinformation in that
3	statute?
4	A. It is.
5	Q. Okay. So there's a congressional
6	mandate that counter foreign propaganda and
7	disinformation?
8	A. Yes.
9	Q. Is that and does the Global
10	Engagement Center carry on activities to
11	implement that mission?
12	A. Yes.
13	MR. KIRSCHNER: Objection, vague.
14	BY MR. SAUER:
15	Q. Can you describe the nature of
16	those activities?
17	MR. KIRSCHNER: Objection, calls
18	for a narrative.
19	BY MR. SAUER:
20	Q. You may answer if you understand
21	the question.
22	A. Could you clarify what you mean by
23	that?
24	Q. What does the Global Engagement
25	Center do to carry out its statutory mission,

1	can you give a summary of that?
2	A. Yeah. It analyzes the activities
3	of adversarial state and non-state actors, so
4	countries like Russia and China, that use
5	propaganda and disinformation to harm the
6	national security of the United States, or
7	terrorist organizations like Al-Queda and Isis.
8	So the Global Engagement Center
9	looks analytically at what those malign actors
10	are doing, how they're using propaganda and
11	disinformation.
12	It also has partnerships, it it
13	supports organizations that can more actively
14	counter the propaganda and disinformation of
15	these foreign actors.
16	And it also coordinates and
17	communicates internally within the US government
18	with other offices at the State Department and
19	with interagency partners.
20	Q. Are there internal divisions or
21	teams within the Global Engagement Center?
22	A. Yes.
23	Q. And from now on can I just refer to
24	it as the GEC?
25	A. Yes.

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1	O And would understand that walma
	Q. And you'll understand that we're
2	talking about the Global Engagement Center;
3	correct?
4	A. Yes.
5	Q. What are the internal divisions or
6	teams within it?
7	A. So there is there are teams that
8	focus on the major threat actors. There is a
9	China team, a Russia team, an Iran team, and a
10	counterterrorism team.
11	And then there are some sort of
12	structural support there's a resources team,
13	there's a front office, there's a I'm not
14	sure what the current name is, but there's an
15	interagency coordination team.
16	Q. Is that the is that the I2C2?
17	A. The I2C2, there's an interagency
18	coordination team, and there's a Technology
19	Engagement Team.
20	Q. And that's sometimes referred to as
21	the TET?
22	(Reporter clarification)
23	MR. SAUER: I think she was talking
24	to me.
25	MR. KIRSCHNER: I was also going to

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1	ask: Can you let him finish his response
2	before before following up.
3	BY MR. SAUER:
4	Q. And is the Technology Engagement
5	Team called the TET?
6	A. Sometimes, yes.
7	Q. And do any of those divisions,
8	teams, or components interface directly with
9	social media companies?
10	A. The Technology Engagement Team does
11	engage with social media companies. The front
12	office and senior leadership engage with social
13	media companies, yes.
14	Q. So what does the TET do to engage
15	with social media companies?
16	MR. KIRSCHNER: Objection, vague.
17	BY MR. SAUER:
18	Q. Can you summarize that for us?
19	MR. KIRSCHNER: Objection, calling
20	for a narrative.
21	BY MR. SAUER:
22	Q. If you understand the question you
23	may answer.
24	A. They hold meetings.
25	Q. What do they discuss in the

1	meetings?
2	A. I'm not in the meetings that the
3	Technology Engagement Team holds with the social
4	media companies.
5	Q. Do you have any understanding of
6	what they discuss in the meetings?
7	A. Yeah, the the the general
8	thrust would be information exchange.
9	Q. And what what kind of
10	information is exchanged?
11	A. Primarily, the tools and techniques
12	that are adversaries. So malign actors like the
13	ones I listed, like Russia and China, how are
14	they using propaganda and disinformation.
15	Q. Is there discussion of technologies
16	that can be used to combat disinformation in
17	those meetings?
18	A. There certainly could be, tools,
19	for example.
20	Q. And is there a discussion of, you
21	know, content posted on social media that might
22	be of concern to the GEC, that's discussed with
23	social media companies in those meetings?
24	A. I think that would be rare. The
25	focus of the discussion would be at a higher

1	conceptual level. It would be: How are these
2	actors doing what they do, not so much specific
3	pieces of content.
4	Q. But do you think there may be rare
5	conversations where specific pieces of content
6	are discussed, of concern?
7	A. Yes, I I couldn't rule it out.
8	Q. Okay. And do you know of any
9	specific instance where that was done in these
10	TET meetings with social media companies?
11	A. No.
12	Q. How about the front office
13	engagement with social media companies that you
14	referred to, what's the nature of that?
15	A. It's primarily relationship
16	building. So at the more senior level the
17	engagements that I would hold, the meetings I
18	would hold, it would be really relationship
19	building to facilitate better communication at
20	the working level.
21	Q. So who would be present at a
22	meeting like that, on your side?
23	A. On our side, it would be the acting
24	coordinator or the coordinator if or the
25	appointed coordinator, probably one or two of

1	the deputies, because there are deputy
2	coordinators, maybe a team chief, and then,
3	potentially, a member of a team with relevant
4	substantive expertise.
5	Q. How frequently do those kinds of
6	meetings occur where someone at the coordinator
7	level and others are meeting directly with the
8	social media platforms?
9	A. Every few months, can b e
10	quarterly, but sometimes less than quarterly.
11	Q. What kind of topics are discussed
12	at those meetings?
13	A. The tools and techniques of our
14	adversaries would probably be the number one
15	topic. So what are the campaigns we see,
16	foreign propaganda actors, like Russia, China,
17	Iran or terrorist organizations, what campaigns
18	are they conducting, what tools are they using,
19	potentially which narratives they're promoting.
20	And we would be in listening mode
21	for anything the companies wanted to share.
22	Q. And you say what the companies
23	wanted to share, what sort of information might
24	that be?
25	A. My recollection is that it was

1	fairly minimal.
2	Q. Can you think of an instance where
3	that happened, you referred to it just now?
4	A. They would also be looking for
5	Chinese disinformation campaigns, fairly general
6	information along those lines.
7	Q. And so they might flag for you, the
8	GEC representatives, content that they see on
9	their platforms that their concerns may be
10	originating from malign state actors?
11	MR. KIRSCHNER: Objection, assumes
12	evidence not in record.
13	BY MR. SAUER:
14	Q. You may answer if you understand
15	the question.
16	A. I don't recall discussions of
17	specific content. These would be higher-level
18	discussions along the lines of a campaign with a
19	narrative, but not specific content that would
20	be a part of the campaign.
21	Q. So they would not be flagging
22	specific posts, for example, but they might be
23	saying, hey, there's a narrative about, you
24	know, at a high-level description that's
25	that's trending on their platform, something

1	like that?
2	A. Yes.
3	Q. Do you remember specific instances
4	where that kind of conversation occurred?
5	A. No.
6	Q. But you have the understanding that
7	that sort of thing would happen?
8	A. Yes, general discussions of
9	campaigns.
10	Q. And then on your side would you
11	also be discussing such campaigns?
12	A. Yes.
13	Q. And flagging them for them; is that
14	fair to say?
15	A. Yes. But I wouldn't use the word
16	flagging. Flagging is generally associated with
17	specific content, that was generally not the
18	focus of our discussions, certainly not the ones
19	that I conducted.
20	Q. So what discussions let me take
21	a concrete example, for example, that's in some
22	of the GECs online materials.
23	I take it there was a campaign back
24	in the 1980s, from Russia and malign actors, to
25	try and accuse the United States of

1	manufacturing the AIDS virus in a laboratory in
2	the 1970s when, in fact, there's demonstrable
3	scientific evidence that it emerged in the
4	1950s, so this is kind of a Russian lie.
5	Is that at the sort of level of
6	specificity that you might be raising these
7	kinds of issues in these meetings with social
8	media platforms?
9	MR. KIRSCHNER: Objection, vague,
10	ambiguous.
11	BY MR. SAUER:
12	Q. If you understand, you may answer.
13	A. Yes, that is the the the
14	level of detail.
15	Q. Yeah, and I'm not asking I'm not
16	asking for a, hey, anything current.
17	A. Mm-hmm.
18	Q. But that would be the nature of
19	information, you might sit down with them and
20	say, hey, look, here's a malign foreign actor,
21	Russia, they are pushing this narrative out on
22	social media platforms using bots or whatever,
23	and, you know, here's the nature of the
24	narrative, and this is something to be on the
25	lookout for; is that a fair characterization of

1	how those discussions go?
2	A. Yes, with the caveat that we might
3	not say: Be on the lookout, it might be just
4	what we're seeing. Our interactions were not
5	directive with social media companies.
6	Q. What's the purpose of advising them
7	of those narratives of concern, from your side?
8	A. The purpose is to deepen their
9	understanding of the actions of malign actors
10	seeking to harm the national security in the
11	United States, in line with the GEC's
12	congressional mandate.
13	Q. Is there a concern or is there an
14	indention that for particularly malign
15	narratives, that once they're advised of them
16	they might be equipped to enforce their content
17	standards against users or bots who post those
18	narratives?
19	A. Could you clarify the question?
20	Q. Is part of the purpose of raising
21	these narratives to inform the social media
22	companies on how they might apply their content
23	modulation policies against that kind of
24	content?
25	MR. KIRSCHNER: Objection,

- 1	
1	ambiguous.
2	BY MR. SAUER:
3	Q. You may answer, if you understand.
4	A. No. Our purpose was not to effect
5	internal decisions at the social media
6	companies. Our purpose was to deepen their
7	understanding of the actions of malign actors.
8	Q. And this these meetings occur
9	every few months; is that fair to say?
10	A. At the senior level, every few
11	months.
12	Q. How often do they occur with the
13	TET level?
14	A. More frequently, but I don't know
15	the exact frequency.
16	Q. Does the GEC engage in any
17	activities where the intention is to influence
18	or or at least propose to social media
19	companies that certain content might not be
20	posted on their platforms?
21	MR. KIRSCHNER: Objection,
22	compound.
23	BY MR. SAUER:
24	Q. You may respond, if you answer
25	A. No.

1	Q if you understand?
2	A. The GEC does not seek to influence
3	the decisions of the social media companies.
4	Q. Does a CE GEC seek to provide
5	information that might inform those decisions?
6	A. No. The GEC is not looking to
7	inform specific decisions. These are general
8	conversations about what we are seeing in the
9	environment. They're not geared toward
10	decisions that the social media companies may or
11	may not make.
12	Q. And are you aware of any instances,
13	whether in the context of these meetings or any
14	other context, where the GEC has been involved
15	in, you know, raising concerns to social media
16	companies, whether directly or indirectly, about
17	content posted on their platforms?
18	MR. KIRSCHNER: Objection,
19	compound.
20	A. Yes, I can recall one specific
21	instance
22	Q. Can you tell me about that?
23	A that with myself.
24	Q. Sorry, I didn't mean to interrupt.
25	Can you tell me about that?

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1	
1	A. Yes. I believe this was in 2018,
2	but I don't have the records in front of me. I
3	was informed by a colleague that there was a
4	security situation in a middle eastern country
5	where demonstrators or protesters were using a
6	social media platform to communicate, and the
7	Department was concerned for the safety of its
8	personnel.
9	And this was a concern that was
10	being tracked in realtime, at the highest levels
11	of the State Department. And that was the one
12	time that I recall that I did communicate
13	directly to a social media platform or
14	representative that this was an ongoing concern.
15	I was very specific in my interactions, simply
16	saying that this is a realtime situation where
17	we believe that the safety of our personnel is
18	at stake, and I would simply ask that you review
19	the activity on these accounts to make a
20	determination in line with your own terms of
21	service.
22	I did not ask for anything to be
23	removed, but I did have a direct interaction
24	about specific content motivated by security
25	concerns about the safety of our people.

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1	Q. Were those posts foreign or
2	domestic?
3	A. All foreign.
4	Q. And what action was taken, to your
5	knowledge, by the social media platforms?
6	A. I don't know what specific action.
7	They did not report back to me.
8	Q. You mentioned that you, personally,
9	engaged in that interaction. Are you aware of
10	others in the GEC having any interactions of
11	that nature, where there's a discussion with
12	social media platforms about specific content of
13	concern?
14	A. No, I'm not.
15	Q. You're not aware of any other
16	personnel within your the GEC doing that on
17	any other occasion?
18	A. There were other personnel involved
19	in this interaction, but not beyond this
20	interaction.
21	Q. How many personnel are at the GEC?
22	A. I I believe it's between one and
23	two hundred now.
24	Q. Okay. And do they all ultimately
25	report to you, in your role as principal deputy

1	coordinator?
2	A. No. I'm I'm currently serving
3	as a senior advisor, so I'm not in a in a
4	direct management role.
5	When I was the acting coordinator,
6	they would have I would have been responsible
7	for the entire office. They would not have
8	reported directly to me. There's a chain of
9	command
10	And, you know, when I was the
11	principal deputy some would report to me, but
12	ultimately it would be the appointed coordinator
13	who was the head of the office.
14	Q. Are how much knowledge do you
15	have of the office's activities in your role of
16	senior advisor? Do you have a good overview of
17	everything the office is doing or do you only
18	really oversee or, you know, get involved in
19	smaller portions of it?
20	A. Currently, only in small portions.
21	I don't have an oversight role.
22	Q. What are the what are those
23	smaller portions that you're involved in?
24	A. Strategic issues of interest to the
25	acting coordinator.

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1	Q. Can you, without getting into too
2	much detail, can you tell us whether any of
3	those issues involved interaction with social
4	media platforms?
5	A. No, they do not.
6	Q. Your answer is: No, they do not?
7	A. No.
8	Q. But are you still participating in
9	these, you know, few monthly meetings with the
10	social media platforms?
11	A. No.
12	Q. That was something you did when you
13	were acting coordinator and deputy acting
14	coordinator?
15	A. Yes, only in my capacity as acting
16	coordinator or principal deputy coordinator.
17	Q. And that was a role that you held
18	from the beginning of 2017 until until about
19	a year ago or about 14 months ago?
20	A. Until June 2021.
21	MR. SAUER: Let me give you a
22	document. Let's call this Exhibit 1.
23	(Exhibit No. 1 was marked for
24	identification.)
25	MR. KIRSCHNER: Mr. Sauer, do you

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1	only have one extra copy for us?
2	
	MR. SAUER: No, we've got two extra
3	copies.
4	MR. KIRSCHNER: Do you mind?
5	MR. SAUER: Yeah, that's fine.
6	That's fine.
7	BY MR. SAUER:
8	Q. Do you recognize this document?
9	A. Can you clarify what that means?
10	Q. Have you ever seen it before?
11	A. No.
12	Q. So if you see at the top, it's a
13	appears to be a White House press release from
14	January 28, 2016; right?
15	A. Mm-hmm.
16	Q. Is that right?
17	A. Yes.
18	Q. And it describes, I believe, the
19	creation by executive order of the Global
20	Engagement Center in the beginning of 2016;
21	right?
22	MR. KIRSCHNER: Objection, assuming
23	facts not in evidence. Can the witness have an
24	opportunity to look at the document?
25	MR. SAUER: Sure.
1	

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1	BY MR. SAUER:
2	Q. And if it helps, if I can direct
3	your attention to the second sentence of the
4	second paragraph?
5	A. Mm-hmm.
6	Q. Talks about how the Department of
7	Homeland Security and the Department of Justice
8	will announce the establishment of a countering
9	violent extremism task force; correct?
10	A. Yes.
11	Q. And then it goes on to say: The
12	State Department will establish the Global
13	Engagement Center; is that fair to say?
14	A. Yes.
15	Q. So is this, to your understanding,
16	the beginning of how the GEC got going, created
17	by executive order in 2016?
18	MR. KIRSCHNER: Objection,
19	speculative.
20	BY MR. SAUER:
21	Q. If you know?
22	A. There was an executive order in
23	2016 that established the Global Engagement
24	Center. Subsequently, there was a provision in
25	the national defense authorization act that

1	created the Global Engagement Center in its
2	current iteration.
3	Q. So in other words, there was a
4	precursor that was created by executive order,
5	and then the 2017 NDAA gave it specific
6	statutory authorization?
7	A. Yes. They're separate separate
8	documents.
9	Q. This press release goes on to
10	say do you see the sentence in that paragraph
11	beginning: Additionally?
12	A. Yes.
13	Q. Today, some of the most senior
14	officials from the White House and across the
15	President's national security team are meeting
16	in Silicon Valley with representatives from a
17	number of leading technology companies?
18	A. Yes.
19	Q. Do you have any understanding of
20	what the nature of those meetings was?
21	A. No.
22	Q. Were you involved in the GEC in
23	this iteration prior to 2017?
24	A. No. I was on detail in the Office
25	of Policy Planning at this time.

1	Q. But from the beginning, at least,
2	it appears there was some aspect of the GEC's
3	mission that involved interacting with social
4	media platforms?
5	MR. KIRSCHNER: Objection, assuming
6	evidence. That's not in the record.
7	BY MR. SAUER:
8	Q. Fair to say?
9	A. I don't see a connection between
10	the meeting in Silicon Valley, here, and the
11	establishment of the Global Engagement Center.
12	I could you explain what the connection is?
13	Q. Do you are you aware of any
14	connection
15	A. I'm not.
16	Q between the GEC and interactions
17	with social media platforms?
18	A. I'm not aware of any connection
19	between the establishment of the Global
20	Engagement Center through the executive order or
21	the Global Engagement Center in its iteration
22	then, and then in the senior officials from the
23	White House meeting in Silicon Valley the Global
24	Engagement Center is not a part of the White
25	House.

1	This sentence talks about, you
2	know, White House national security team, I
3	don't know whether the Global Engagement Center
4	was involved in that.
5	Q. Let me ask you this: How how
6	how you've been there since the beginning of
7	2017, during all that time have there been
8	interactions with social media companies to
9	discuss narratives and things like that?
10	A. I I don't believe it was across
11	the entire time. The initial period was really
12	focused on setting up the office. So there
13	weren't there weren't a lot of outside
14	meetings. I don't recall when, exactly, they
15	began.
16	Q. Did you ever have a conversation
17	with social media companies where you encouraged
18	them to speed up the removal of posts that they
19	posted online?
20	A. No.
21	MR. SAUER: Let's do B.
22	Let me give you another document.
23	This will be, I think, labeled Exhibit 2.
24	(Exhibit No. 2 was marked for
25	identification.)

1	BY MR. SAUER:
2	Q. And is this a report from USA Today
3	dated February 9th, 2018, discussing the Global
4	Engagement Center?
5	A. Yes.
6	Q. And you're quoted in this article,
7	aren't you, in there, in the second paragraph?
8	MR. KIRSCHNER: Objection. I would
9	like to have an opportunity to read this
10	article, as well, before before going forward
11	on this.
12	MR. SAUER: If you're going to read
13	the entirety of every document we're going to be
14	here a long time.
15	MR. KIRSCHNER: Just to be able to
16	put eyes on the document, just
17	MR. SAUER: I tell you what, when I
18	get to a question that is of concern, and we
19	need some time, let me know. But
20	MR. KIRSCHNER: You just give at
21	least the witness a little bit of time to
22	familiarize himself with the document?
23	BY MR. SAUER:
24	Q. Well, let me ask this: Do you
25	recall giving an interview to the USA Today in

1	around February of 2018 or giving comments to
2	them?
3	A. I I I don't recall it
4	specifically, but I gave I did a fair amount
5	of media engagement, so I I see the
6	interview, yes.
7	Q. And do you see there, on the second
8	paragraph of this, where it talks about how
9	there's an agreement to transfer 40 million
10	dollars from the Defense Department to more
11	fully fund the GEC?
12	A. Mm-hmm.
13	Q. You remember that incident, I'm
14	sure.
15	A. Yes.
16	Q. And do you remember talking to the
17	media about that?
18	A. I don't recall speaking to the
19	media specifically about the funding transfer.
20	Q. Two paragraphs down from that,
21	there's a reference to Stephen Goldstein, the
22	State Department Undersecretary for Public
23	Diplomacy, describing the Center's job; is that
24	fair to say?
25	A. Yes.

1	Q. Do you remember getting involved in
2	a conversation with reporters with
3	Mr. Goldstein?
4	A. I don't recall whether
5	Undersecretary Goldstein and I did a joint or
6	separate engagement with USA Today for this
7	interview.
8	Q. Okay. Can you turn to the next
9	page of this article.
10	A. Mm-hmm.
11	Q. Actually, turn in two pages, to the
12	third page of the document.
13	A. Okay.
14	Q. There is a freestanding paragraph
15	that begins: Some of that work has already
16	begun, Kimmage and Goldstein said; do you see
17	where it says that?
18	A. Yes.
19	Q. And then immediately below that,
20	there's a quote from Goldstein, that said: Top
21	managers have been working with other government
22	agency, the White House, and technology
23	companies, quote, encouraging them to help us in
24	this fight; correct?
25	A. That is Undersecretary Goldstein's

_	
1	quote, correct.
2	Q. And do you remember him saying
3	that?
4	A. I I I don't. I don't know
5	whether I was there when he said that.
6	Q. Okay. And then it goes on to say
7	he, which I take it refers to Goldstein, met
8	with executives in Google, in January, and
9	Twitter in February, and plans to meet with
10	Facebook; correct?
11	A. Yes.
12	Q. And were you present at those
13	meetings?
14	A. I don't recall being present at
15	those meetings.
16	Q. Okay. And it goes on to say: They
17	discussed shutting down bots, thousands of
18	automated accounts that spew misleading
19	information; correct?
20	A. Yes.
21	Q. So that
22	A. Correct.
23	Q would be a discussion of taking
24	content down from a social media platform;
25	correct?

1	A. Can I clarify? This is
2	Undersecretary Goldstein's engagement. I wasn't
3	present there. I can't speak to the content of
4	his engagement.
5	Q. You don't remember whether or not
6	you were present for those meetings?
7	A. I don't.
8	Q. You don't recall?
9	Do you recall having any specific
10	recollection of what's discussed here?
11	A. No.
12	Q. Okay. And then he goes on to say
13	that he discussed with Google, Twitter, and
14	plans to discuss with Facebook to speed up the
15	removal of posts and videos that target US
16	audiences; correct?
17	MR. KIRSCHNER: Objection, assumes
18	evidence not in the record. These are not
19	quotes. These are paraphrases.
20	BY MR. SAUER:
21	Q. That's what the article reports him
22	as saying; correct?
23	A. That's what the article reports him
24	as saying, correct.
25	Q. Not with quotes around it, but as a

1	<pre>summary; correct?</pre>
2	A. Correct, as a summary.
3	Q. Do you remember any conversations
4	from that timeframe where there was a discussion
5	of speeding up the removal of posts between
6	anyone associated with the State Department and
7	any social media platform?
8	A. I don't recall any conversations
9	between myself, at the GEC, and social media
10	companies about speeding up the removal of
11	posts.
12	Q. Do you recall anyone from the State
13	Department telling you that they had a
14	conversation with a social media platform about
15	speeding up the removal of posts?
16	A. No. I recall Undersecretary
17	Goldstein engaging with the companies, and I
18	don't remember all of the details. I I I
19	don't remember what he said he discussed with
20	them.
21	Q. Okay. And you you don't recall
22	whether you were personally present when those
23	meetings occurred?
24	A. I don't believe I was, but I
25	don't I don't I don't recall being

1	present, no.
2	Q. How about anyone else, other than
3	Secretary Goldstein, Undersecretary Goldstein,
4	have you ever had a discussion with anyone else
5	at the State Department that discussed, for
6	example, talking to social media platforms about
7	speeding up the removal of posts?
8	A. I don't recall any conversation
9	with others at the State Department about
10	specifically speeding up the removal of posts.
11	Q. How about any kind of removal of
12	posts, any discussion, other than the incident
13	you described earlier, obviously, in 2018?
14	A. Outside of the very specific
15	context of this is what I would describe as an
16	exceptional case involving a threat, I don't
17	recall specific discussions of meetings with
18	social media companies about speeding up the
19	removal of posts.
20	Q. How about making sure or how
21	about taking steps to stop bots from from
22	spreading disinformation?
23	A. I don't recall conversations about
24	taking steps. We would talk about foreign
25	actors use of things like bots, but not to

1	encourage some type of action, it would be
2	really for a to inform. So I don't recall
3	conversations about taking steps.
4	Q. Would you do you recall
5	conversations about informing social media
6	companies that bots are spreading a certain kind
7	of disinformation or narrative?
8	A. I do recall conversations about
9	Chinese use of bots to spread propaganda
10	narratives.
11	Q. Do you know whether the use of bots
12	would violate the social media platforms content
13	violations policies?
14	A. I don't know, no.
15	Q. Are you aware of anyone at the
16	State Department, including the GEC, going
17	through intermediaries to indirectly flag or
18	raise content concerns with social media
19	platforms?
20	A. Could could you clarify?
21	Q. Well, are you aware of any instance
22	where someone at a social media platform or
23	sorry someone at the GEC may have gone to
24	some third party on the understanding that that
25	third party might convey a concern about content

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1	on the social media platform to the social media
2	platform?
3	A. I no, I can't speak to every
4	engagement that someone at the State Department
5	might have had.
6	Q. Are you aware of any engagements of
7	that nature that I described?
8	A. No, not that I can think of.
9	MR. SAUER: Can you get C?
10	Let's call this Exhibit 3.
11	(Exhibit No. 3 was marked for
12	identification.)
13	MR. KIRSCHNER: Mr. Sauer, so to
14	clarify the record, now never mind. I see
15	you're are you identifying this as USA Today,
16	as the the URL is not USA Today, so both for
17	Exhibit 2 and assume you'll also mention for
18	Exhibit 3, is it because there's a USA Today in
19	parenthetical next to the author? I just want
20	to make sure I understand.
21	MR. SAUER: Yeah, that's all I'm
22	referring to.
23	MR. KIRSCHNER: Okay.
24	BY MR. SAUER:
25	Q. Then can you take a quick look at

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1	this article by Oren Dorell, who is indicated in
2	parentheses as from USA Today?
3	A. Mm-hmm.
4	Q. And is this one dated September
5	sorry February 13th, 2018, so just a few days
6	after Exhibit 2?
7	A. Yes.
8	Q. Does this article, if you turn to
9	page 2, also refer to you and quote you?
10	A. Yes, I see my name.
11	Q. Yeah, and in the middle of the
12	second page, you see where you're quoted as
13	saying: We're now a coordinating body and
14	incubator of ideas; right?
15	A. Yes.
16	Q. Okay. And then below that it says:
17	How does the Center do that? And then it says:
18	The Center's 66 employees coordinate with US
19	agencies, such as the FBI and the Department of
20	Homeland Security, to target the American
21	audience; correct?
22	A. Yes, that's what this says.
23	Q. Is that a fair description of of
24	what you told them at the time, do you think?
25	A. No, it's not.

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1	Q. Why what's unfair about that?
2	A. The Global Engagement Center does
3	not target American audiences.
4	Q. Okay. How does it coordinate with
5	US agencies at FBI and the Department of
6	Homeland Security?
7	A. It meets with them periodically.
8	Q. How often do those meetings occur?
9	A. At the senior level, every few
10	months, I would say.
11	Q. And then at what other levels?
12	A. At the working level, you would
13	have regular engagement through the National
14	Security Council on a much more frequent basis,
15	because you would have officials from all
16	agencies there. But maybe every few weeks at
17	the working level.
18	Q. So every few weeks, under the aegis
19	of the National Security Agency, there would be
20	coordination between the GEC, the FBI, and
21	the and the DHS; correct?
22	A. No.
23	MR. KIRSCHNER: Objection. I was
24	going to say, mischaracterizes the evidence.
25	A. No. You said National Security

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1	Agency, that's a component of the intelligence
2	community.
3	The meetings I would refer to would
4	be through the National Security Council.
5	Q. I got you.
6	A. Which periodically convene all the
7	agencies within the National Security Complex.
8	Q. Are there any other forms of direct
9	coordination between the FBI and DHS and GEC?
10	A. Yes. There are periodic meetings
11	and there are interagency forums where
12	representatives of those agencies would be
13	present.
14	Q. How often do those occur?
15	A. Every few weeks or months.
16	Q. And who who not I don't
17	want their names, but what sort of personnel
18	from the GEC are participating in these
19	meetings?
20	A. Clarification, could you clarify,
21	at the senior level or the working level?
22	Q. Well, why don't we start with the
23	senior level. Who at the senior level, you
24	know, by title, would be participating in those
25	kinds of meetings with the FBI and DHS, outside

1	the aegis of the NEC and meetings you referred
2	to earlier.
3	A. At the senior level it would be the
4	coordinator, either acting or appointed, and
5	potentially the principal deputy coordinator.
6	Those would be the senior-level meetings. And
7	at the working level, probably a team director
8	from the Global Engagement Center.
9	Q. Which team would typically do that?
10	Would that be the TET or the I2C2 or who would
11	be doing that?
12	A. It would be entirely dependent on
13	the focus of the meting. If a meeting is
14	focused on Russia, it would be the Russia team.
15	Generally, it would be threat-actor focused.
16	Q. Threat-actor focused?
17	A. Threat-actor focused, so Russia,
18	China, counterterrorism.
19	Q. If you turn back to that article
20	let me ask this: Those meetings you described,
21	are they on an as-needed basis or is there a
22	kind of standing or recurring meeting between
23	GEC and FBI and DHS?
24	MR. KIRSCHNER: Objection, vague.
25	A. I I don't recall any standing

1	meeting with FBI. There were standing internal
2	forums, where both GEC and potentially FBI or
3	DHS would be there, but it wasn't a specific
4	meting for the GEC and that agency to
5	coordinate. They would be there as part of a
6	larger group.
7	Q. Okay. What what sorts of
8	discussions would they have at a meeting like
9	that? You know, can you characterize the sorts
10	of discussions that would occur in those kinds
11	of meetings?
12	A. I would describe them as
13	threat-actor focused. So it would be the
14	actions of a specific foreign threat actor and
15	then the coordination of what the interagency
16	would do in response.
17	Q. And would would content on
18	social media platforms be discussed at those
19	meetings as part of a threat-actor focus?
20	A. Generally, the focus would be on
21	the threat actor, potentially with mention of
22	social media. Outside of a specific threat you
23	would generally not focus on content, specific
24	pieces of content, with the exception of, for
25	example in counterterrorism, something that

1	would be threat related.
2	Q. How about these narratives, for
3	example, you said there might be a Russia
4	meeting where that involves the GEC and the FBI
5	and DHS, or a China-focused meeting, suppose
6	Russia and malign actors are pushing narratives
7	on social media, would that be discussed at
8	these meetings?
9	MR. KIRSCHNER: Objection,
10	speculative, and calling for a hypothetical.
11	BY MR. SAUER:
12	Q. If you know?
13	A. Are you asking about a specific
14	meeting?
15	Q. Well, more generally, is that
16	something that has come up from time to time, to
17	your knowledge?
18	A. Russian narratives would come up in
19	the context of a meeting.
20	Q. And would those be are there
21	scenarios where GEC actors are briefing the FBI
22	and DHS on Russian narratives?
23	A. I don't know that the GEC would be
24	the lead briefer. It would really depend on the
25	meeting and the context. You might have the

1	intelligence community, for example, lead with a
2	briefing.
3	There are subject matter experts at
4	the GEC who can speak to that. I can't say who
5	briefed what at a at a specific meeting.
6	Q. But you you're aware, at least,
7	that narratives from threat actors on social
8	media have been discussed at those meetings?
9	MR. KIRSCHNER: Objection, assuming
10	evidence not in the record.
11	A. Yes, it's part of the GEC's
12	congressional mandate to identify the propaganda
13	and disinformation of malign foreign actors and
14	a significant amount of that is structured
15	around narratives, yes.
16	Q. Okay. So so it would be it
17	would be, I take it, sort of routine practice
18	for GEC staff to brief the FBI about a malign
19	foreign narrative or brief DHS about a malign
20	foreign narrative that they've identified?
21	MR. KIRSCHNER: Objection, assumes
22	evidence not in the record.
23	BY MR. SAUER:
24	Q. Go ahead.
25	A. No, I don't recall it being routine

1	practice. The GEC met infrequently with the
2	FBI. I don't recall any specific meetings with
3	the FBI. They would be present at interagency
4	forums, but there were no specific meetings I
5	can recall where the GEC would meet with the FBI
6	to brief them on narratives.
7	Q. How about DHS, did the GEC meet
8	with DHS to and at least as part of that
9	meeting inform them about malign foreign
10	narratives?
11	A. So there were meetings with DHS at
12	the senior level. I don't recall whether
13	narratives were discussed. I don't believe that
14	narratives would have been a focus for the
15	meetings with DHS.
16	Q. Who is at these meetings at the
17	senior level, on your side?
18	A. I recall meetings with DHS with the
19	appointed coordinator, where I was present in my
20	role as the principal deputy.
21	Q. Who else on the GEC side?
22	A. On the GEC side, you would have one
23	or potentially two of the other deputies, the
24	team chiefs, and then maybe some individuals
25	from the what we call the threat team, so the

1	China or the Russia team, with relevant subject
2	matter expertise.
3	Q. And who would participate on the
4	DHS side?
5	A. On the DHS side, it would be the
6	the principal, and then I don't recall the
7	people on the DHS side. I believe yeah
8	Q. What does that mean, the principal?
9	A. The principal is the highest level
10	official involved in the meeting.
11	Q. So who would what would the
12	title of that person be at these meetings?
13	A. I I believe it would I'm I
14	don't recall whether we had a meeting with the
15	undersecretary for CISA, the the center
16	for the Cyber and Infrastructure Security
17	Agency, or whether it was the official below
18	that.
19	There's also a team at DHS that
20	deals with disinformation. So I don't it
21	would have been either the undersecretary or
22	someone more junior
23	Q. Okay.
24	A who was a principal for DHS.
25	Q. I'm sorry, finish.

1 A. So it would be either the
2 undersecretary or the people below that. I I
3 believe there was at least one meeting involving
4 the GEC coordinator and the DHS undersecretary.
5 Q. And when you said undersecretary,
6 and you referred to CISA?
7 A. Right.
8 Q. So for clarity of the record, CISA
9 is the Cyber Security and Infrastructure
10 Security Agency within DHS; correct?
11 A. Yes. Yes.
12 Q. And the person you described as the
13 undersecretary, is that the director of CISA?
14 A. Yes.
Q. Okay. And who was that person who
16 was at the meetings, was that Director Krebs or
17 Director Easterly?
18 A. It would have been Director Krebs
19 in the period, that I recall.
Q. Okay. Do you know how many
21 meetings there were at the
22 director-to-coordinator level with CISA?
23 A. I believe there was at least one.
Q. Do you know if there were more than
25 one?

1	A. I I I don't recall. There
2	may have been. I don't recall.
3	Q. What would the timeframe of these
4	meetings have been?
5	A. It would have been between 2019 and
6	2021.
7	Q. So at some point you had one or
8	more meetings in a three-year period?
9	A. I I I
10	Q. You had at least one, but maybe
11	more meetings with the CISA director sometime in
12	2019, 2020 or 2021?
13	A. Yeah, there were one or more
14	meetings during the two-year period when the GEC
15	had an appointed coordinator.
16	Q. When was that?
17	A. That would have been between
18	February 2019 and February 2021, so that
19	two-year period.
20	Q. Okay. Do you remember anywhere
21	within that two-year range when that meeting
22	occurred?
23	A. I believe it was 2020, but I'm
24	I I I don't remember.
25	Q. Do you recall what, generally, was

1	discussed at that meeting?
2	A. I don't recall the full agenda.
3	The primary purpose was information
4	sharing and update on the GEC, what is the GEC
5	focused on, what is it doing, what are its major
6	activities.
7	And then I don't recall what the
8	the CISA part of the agenda was, but the I
9	would describe the primary focus as information
10	sharing.
11	Q. When you say information sharing,
12	were you trying to set up or establish a
13	coordination or communicating relationship
14	between the two agencies, GEC and CISA?
15	A. Could you clarify what you mean by
16	coordinating or communicating relationship?
17	Q. Well, let me rephrase that
18	question.
19	In that meeting, did you propose
20	ongoing communication or coordination between
21	GEC and CISA?
22	MR. KIRSCHNER: Objection to the
23	extent that this calls for privilege
24	information, that's deliberative, I would
25	instruct the witness not to answer. To the

1	extent you can answer the question without
2	revealing privileged information, you can go for
3	it.
4	A. The GEC's congressional mandate
5	strongly encourages ongoing communication with
6	all of the agencies that are engaged on
7	propaganda and disinformation by foreign actors.
8	Q. Is there is there ongoing
9	communication between the GEC and CISA?
10	A. I don't know, now. There were
11	periodic meetings, they were not very frequent.
12	But how would you define ongoing?
13	Q. Well, you used the word, how would
14	you define it? You referred to on you said
15	your statutory mandate requires ongoing
16	communication, and I asked whether there is
17	ongoing communication with CISA.
18	Can you describe what kind of
19	communication with CISA occurred during the
20	period of your knowledge, that five-year period
21	when you were acting coordinator?
22	A. So I was acting coordinator for two
23	years, and then I was the principal deputy for
24	two. And there were there was at least one
25	senior-level and potentially more senior-level

1	engagements every few months, I would say.
2	Q. When you say more senior-level
3	engagements every few months, who would have
4	participated in those?
5	A. The senior-level engagements, as I
6	said, would involve the coordinator, the acting
7	coordinator, the appointed coordinator, and the
8	principal deputy, those are the senior-level
9	engagements.
10	Q. Okay. So senior-level engagements
11	would include you
12	A. Yes.
13	Q and then the CISA director;
14	correct?
15	A. Yes.
16	Q. And you said those engagements
17	would occur every few months?
18	MR. KIRSCHNER: Objection, assuming
19	evidence not in the record, and
20	mischaracterizing his testimony?
21	BY MR. SAUER:
22	Q. Is that correct, those would occur
23	every few months?
24	A. Every few months, I know we had at
25	least one meeting, and there were at there

1	may have been two, so every few months, yeah.
2	Q. One meeting or two over a four-year
3	period or every few months, those seem different
4	to me, can you clarify?
5	A. Sure. I think the aim was to meet
6	every few months. I don't know that we achieved
7	that.
8	Q. How about at the staff level,
9	below, you're I think we've been talking
10	about the principal level
11	A. Yeah.
12	Q in these interactions between
13	GEC and CISA, how about at the staff level?
14	A. At the staff level, outside of the
15	NSC process, I I don't recall how frequently
16	GEC representatives met with the the
17	disinformation office within CISA.
18	Q. When you say the disinformation
19	office within CISA, is that the team that's been
20	described as the mis-dis- and mal information
21	team?
22	A. I believe that's the current name
23	for it, yes.
24	Q. And did it previously have a name
25	that was something like the countering in any

1	event, so when you're talking
2	A. Right.
3	Q about this earlier, when you
4	referred to how there was a meeting with either
5	the director or the director of the
6	misinformation group
7	A. Mm-hmm.
8	Q that's a reference to what
9	became came to be known and still is known as
10	the mis-dis- and mal information team; correct?
11	A. Yes. Yes.
12	Q. Who was the director or who was the
13	head of that group?
14	A. I don't recall.
15	Q. Were there ongoing interactions
16	between GEC staff and in that mis-dis- and
17	mal information team?
18	MR. KIRSCHNER: Objection,
19	speculative.
20	A. I believe there were interactions.
21	I don't recall how frequent they were or how
22	ongoing.
23	Q. Do you know what was discussed in
24	those interactions, generally?
25	A. Specifically, no, generally,

1	information sharing.
2	Q. Okay. What kind of information was
3	shared?
4	A. The actions of the major malign
5	foreign propaganda and disinformation actors
6	as as as part of the GEC's mandate.
7	Q. So it would be discussions of
8	the you know, sorts of narratives that are
9	being pushed by malign foreign actors?
10	MR. KIRSCHNER: Objection, assumes
11	evidence not in the record.
12	BY MR. SAUER:
13	Q. Is that fair to say?
14	A. It could be anything from the plans
15	of those actors to the activities. I can't
16	speak to the nature of the discussions. I
17	wasn't part of them.
18	Q. Okay. Do you know who participated
19	in those on the GEC side?
20	A. No, I don't. I don't.
21	Q. Can you stick with Exhibit 3,
22	there, right in that same middle of the second
23	page, we talked about how the center's 66
24	employees coordinate with US agencies, such as
25	the FBI and the Department of Homeland Security;

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1	correct?
2	A. Yes, that's what the paragraph
3	says.
4	Q. And then the the news article
5	goes on to say: To target the American
6	audience; correct?
7	A. Yes, that's what the news article
8	says.
9	Q. And you you don't think that's a
10	fair characterization of what you would have
11	said to them at the time?
12	A. No. That's an inaccurate
13	characterization of the GEC's mission and focus.
14	Q. Does the GEC's mission and focus
15	include concern about foreign narratives that
16	are pushed on social media that get replicated
17	by domestic speakers?
18	So suppose, for example, Russia is
19	pushing the narrative that the US government
20	invented the AIDS virus in a lab in 1970, and
21	they pushed that out through media or social
22	media, and it gets re-tweeted by, you know,
23	domestic actors, is that a point of concern for
24	the GEC?
25	MR. KIRSCHNER: Objection, calls

1	for a hypothetical.
2	BY MR. SAUER:
3	Q. If you know.
4	A. The GEC's concern is with the
5	actions of foreign propaganda actors. The GEC's
6	concern stops there. It doesn't extend to the
7	speech of Americans.
8	Q. Okay. So if American like,
9	Americans pick up, for example, a malign foreign
10	narrative, is that something that you would
11	the GEC would track?
12	MR. KIRSCHNER: Objection.
13	BY MR. SAUER:
14	Q. That, oh, this is getting traction
15	in the you know, in the American social media
16	sphere?
17	MR. KIRSCHNER: Objection,
18	speculative, hypothetical.
19	A. No. The GEC does not track the
20	American social media sphere.
21	Q. Okay. So you don't pay attention
22	to what's being said on Facebook and Twitter and
23	whether or not they are whether or not these
24	malign foreign narratives are kind of spilling
25	over into what Americans are saying on Facebook

1	and Twitter and YouTube and so forth?
2	MR. KIRSCHNER: Objection,
3	ambiguous.
4	BY MR. SAUER:
5	Q. If you is that correct?
6	A. No. The GEC's focus is on foreign
7	propaganda and disinformation.
8	Q. Would the GEC ever discuss with
9	social media platforms in these various
10	interactions issues about whether or not malign
11	foreign narratives have been replicated in
12	domestic speech?
13	A. No. That would not be the GEC's
14	focus. I can't speak to what the social media
15	companies may raise or how they raise it, but
16	that would not be the GEC's focus.
17	Q. How about CISA, is that something
18	that CISA might focus on, to your knowledge?
19	A. I can't speculate about CISA's
20	focus.
21	Q. CISA is C-I-S-A; correct?
22	Do you know what CISA's mission is?
23	A. It's I assume it's listed on
24	their website. I'm not going to try to
25	reproduce it.

1	
1	Q. I'm just asking if you know. Do
2	you have a general understanding of what they're
3	concerned with?
4	A. It's primarily cyber security
5	focused.
6	Q. And how about the mis-dis- and mal
7	information team, do you know what their focus
8	is?
9	MR. KIRSCHNER: Objection,
10	speculative.
11	BY MR. SAUER:
12	Q. If you know.
13	A. I don't recall their precise
14	mission within within CISA. It was a small
15	team.
16	Q. How about more generally, do you
17	have a general understanding of what that team
18	focuses on?
19	MR. KIRSCHNER: Objection,
20	speculative.
21	BY MR. SAUER:
22	Q. If you know.
23	A. Disinformation and misinformation
24	as it pertains to cyber and infrastructure
25	security.
	<u> </u>

1	Q. And does that include
2 r	misinformation and disinformation that come from
3 (domestic actors?
4	MR. KIRSCHNER: Objection,
5 .	speculative.
6	A. I don't know.
7	Q. So you don't know whether the
8 r	mis-dis- and mal information team focuses
9	exclusively on foreign disinformation or whether
10	its concern with disinformation extends to sort
11 (of disinformation propagated by domestic
12	speakers?
13	A. I'm not going to speculate about
14 t	the focus of a team at another agency.
15	Q. I'm not asking you to speculate.
16	I'm just asking you to answer if you know. What
17 c	do you know?
18	A. I don't recall what their specific
19 1	focus was within the CISA mandate.
20	Q. Same paragraph there in paragraph
21 1	three, under: How does the center do that.
22	A. Mm-hmm.
23	Q. The next sentence goes on to say
24 1	that it, meaning the GEC, works with social
25 r	media companies that have been used to spread

1	foreign propaganda; correct?
2	A. Correct, that's what the sentence
3	says.
4	Q. And is that I take it they're
5	attributing that sentence to you in this
6	article; correct?
7	MR. KIRSCHNER: Objection, assumes
8	evidence not in the record.
9	BY MR. SAUER:
10	Q. Is that your understanding?
11	A. I don't see that here.
12	Q. Okay. Well, let me ask you this:
13	Did you tell a reporter that the GEC works with
14	social media companies that have been used to
15	spread foreign propaganda?
16	A. I wouldn't characterize it as works
17	with, I would characterize it as meets with,
18	periodically, social media companies, that, you
19	know, have been used to spread foreign
20	propaganda.
21	Q. Okay. And does the GEC still do
22	that to this day?
23	A. I believe that the the meetings
24	continue, yes.
25	Q. Do you know who who is attending

1	those meetings nowadays?
2	A. No.
3	Q. Do you know who attended meetings
4	like that during 2021, meetings between social
5	media platforms and GEC personnel?
6	A. So the senior-level meetings would
7	have involved me and one or more of the deputy
8	coordinators, the chiefs of the relevant teams,
9	and then working-level people with relevant
10	subject matter expertise.
11	Q. And I think you may have talked
12	about this earlier, but how often would those
13	meetings occur in 2021, specifically?
14	A. I believe with the aim was for
15	quarterly meetings. I don't know that they
16	always happened on a quarterly basis.
17	Q. And what social media platforms
18	were met with?
19	A. I believe we had meetings with
20	Twitter and maybe Facebook or Google.
21	Q. How about YouTube. Google is I
22	think owns YouTube. Was that a YouTube-related
23	meeting?
24	A. I don't I don't recall.
25	Q. How about Parler?

1	A. I don't recall meeting with Parler.
2	I don't believe we met with them.
3	Q. How about LinkedIn?
4	A. I don't recall a meeting with
5	LinkedIn.
6	Q. How are these meetings done, is it
7	all on a big Zoom call, or do you guys fly to
8	San Francisco or do you meet with their you
9	know, their their D.C. people, like, who
10	who where do they occur?
11	A. Sure. Before COVID the meetings
12	would be generally at the GEC offices in
13	Washington, D.C.; in 2021, it would have been
14	over Zoom or a virtual platform.
15	Q. Okay. And would there be, for
16	example, would there be, you know, on people's
17	calendars electronic invites to those Zoom
18	meetings?
19	A. I believe so, yes.
20	Q. Would that include your calendar?
21	A. Yes.
22	Q. Okay. So if you were to look at
23	your calendar for 2021, you could probably
24	figure out which social media platforms you met
25	with and how often; fair to say?

1	MR. KIRSCHNER: Objection,
2	mischaracterizes evidence, assumes evidence not
3	in the record.
4	A. Yes.
5	Q. Okay. So you said, like, for
6	example, in the 2021 timeframe the goal was to
7	meet with them quarterly, and you can't remember
8	whether or not you met that goal; correct?
9	A. Yeah, yeah, I don't I don't
10	remember whether we ever had a recurring
11	quarterly meeting on the calendar.
12	Q. And that you believe you met with
13	Twitter and Facebook; correct?
14	A. Yes.
15	Q. Possibly met with YouTube and,
16	slash, Google?
17	A. Possibly.
18	Q. Do you remember any other social
19	media platforms that you've ever met with?
20	A. In 2021?
21	Q. Well, we'll start with 2021, yeah.
22	A. No, I I I recall meeting with
23	Twitter.
24	Q. Mm-hmm.
25	A. And possibly with the other

1	companies you mentioned. I do not recall any
2	other meetings with with big social media
3	companies.
4	Q. How about little social media
5	companies?
6	A. With social media companies.
7	Q. How about others at at others
8	at the GEC, are you aware of them meeting with
9	social media companies?
10	A. No. It wouldn't normally they
11	wouldn't share every single meeting with me.
12	Q. Okay. Are you generally aware that
13	such meetings occurred, that you were not
14	participating in, during the 2021 timeframe?
15	A. Yes.
16	Q. Okay. Who would have participated
17	in meeting with social media companies then?
18	A. Representatives of the Technology
19	Engagement Team, and then relevant members of
20	what we call the threat team, so the Russia
21	China, Iran, or counterterrorism teams.
22	Q. Do you know what social media
23	companies were met with?
24	A. No.
25	Q. And do you know what kind of

1	threats were discussed?
2	A. The I I don't know the
3	specific threats that were discussed, no.
4	Q. Starting with focusing on your
5	meetings
6	A. Mm-hmm.
7	Q at any of your meetings, where
8	it was foreign generated election-related
9	disinformation discussed with social media
10	platforms?
11	A. I don't recall any discussion of
12	election-related threats in my 2021 meetings.
13	Q. How about in earlier meetings, how
14	about in 2019, 2020, at any time did you have a
15	meeting with the social media platform where
16	election-related disinformation was discussed?
17	A. I don't recall a meeting focused on
18	election-related disinformation or propaganda.
19	The companies may have briefed on some of the
20	steps they were taking. They spoke about this
21	publicly, as well. But I don't recall the GEC
22	introducing anything election-related.
23	Q. What do the companies say about
24	election-related disinformation?
25	A. I don't recall the specifics, just

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1	that they were focused on it and taking steps.
2	Q. Did they tell what steps they were
3	taking?
4	A. I don't recall the specifics.
5	Q. Did those steps that they were
6	taking include steps relating to content
7	modulation?
8	A. Not that I recall. I believe it
9	would have been more along the lines of I
10	believe there was media coverage of, like, a war
11	room or or things like that.
12	MR. KIRSCHNER: Mr. Sauer, just in
13	terms of timing, what do you think? We've been
14	going for about an hour.
15	MR. SAUER: I'm fine with a short
16	break now. Let's keep it real short. Are you
17	guys okay with that?
18	MR. KIRSCHNER: Yeah.
19	MR. SAUER: Let's go off the
20	record.
21	MR. KIRSCHNER: Do a five-minute
22	break.
23	THE WITNESS: Okay.
24	THE VIDEOGRAPHER: Just one second.
25	MR. KIRSCHNER: Then we'll go for

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1	another 45 minutes or an hour.
2	MR. SAUER: Let's hold it for five
3	minutes.
4	MR. KIRSCHNER: Yeah, okay.
5	MR. SAUER: Are we off the record?
6	THE VIDEOGRAPHER: The time is
7	11:10 a.m. We're off the record.
8	(Recess.)
9	THE VIDEOGRAPHER: The time is
10	11:21 a.m. We are back on the record. Please
11	proceed.
12	BY MR. SAUER:
13	Q. Mr. Kimmage, who is Alexis Frisbee?
14	A. Alexis Frisbee is a member of the
15	Technology Engagement Team the Global Engagement
16	Center.
17	Q. That's the TET, as we've called it?
18	A. Yes.
19	Q. At what what's her what's her
20	title within that team?
21	A. I don't recall her title.
22	Q. Is she the head of the team or is
23	she a member of the team?
24	A. No. She's not the head of the
25	team. She's a member of the team.

1	Q. Are you aware of her communicating
2	with social media platforms?
3	A. I believe she helped to set up
4	meetings, yes.
5	Q. Okay. And did she have
6	communications with them or did she just set up
7	the meetings?
8	A. The communication I'm aware of
9	would be in the context of setting up a meeting.
10	Q. So you're aware that she set up a
11	meeting with what social media platform?
12	A. I don't recall.
13	Q. Was it more than one?
14	A. I I don't recall.
15	Q. What was the timeframe of that,
16	setting up that meeting?
17	A. I believe it would have been 2021.
18	Q. Do you know whether she
19	participated in the meetings that she set up?
20	A. I I don't recall.
21	Q. Who who would have participated
22	in the meetings that she set up or who did
23	participate in the meeting or meetings that she
24	set up?
25	A. Sure. In the we've already been

1	through this, I believe, the acting coordinator,
2	one or more of the deputies, the team chiefs
3	from some of the threat teams, and then some
4	working-level staff with relevant subject matter
5	expertise.
6	Q. So did she set up all of the
7	meetings that you described as aspire to be
8	quarterly in 2021 or did she set up one
9	particular one?
10	A. I I I don't know. The the
11	coordinator doesn't normally know who sets up
12	the meetings.
13	Q. How do you know she set up that one
14	or more?
15	MR. KIRSCHNER: Objection, assuming
16	evidence not in record.
17	BY MR. SAUER:
18	Q. If you know?
19	A. I believe she she she helped
20	to set up at least one meeting.
21	Q. What makes you think that? What do
22	you remember about that?
23	A. She was on the Technology
24	Engagement Team.
25	Q. Do you remember any specific issue

1	that that was discussed in the meeting she
2	set up?
3	A. The the agenda, you know, we
4	we went over would have been an update on what
5	the Global Engagement Center is seeing in the
6	environment, some of the potentially relevant
7	analysis that the Global Engagement Center would
8	be engaged in, and then information sharing with
9	whatever the social media company wanted to
10	share.
11	Q. Do you know if this was a
12	Russia-specific meeting or a China-specific
13	meeting or an Isis-specific meeting?
14	A. I don't recall the 2021 meetings as
15	being focused on a specific threat actor.
16	Q. What were they more focused on?
17	A. I believe it would have been across
18	the board, so here's what China is potentially
19	up to, here's what Russian propaganda
20	disinformation is, I don't recall the specific
21	agenda, but I don't believe it was limited to a
22	single threat actor.
23	Q. Okay. Were there other threat
24	actors that were discussed in those 2021
25	meetings, besides, I think you mentioned, Russia

1	and China?
2	A. Potentially, I just don't recall
3	the specific agenda.
4	Q. Do you recall election-related
5	issues being discussed in any of those meetings?
6	A. Could you
7	MR. KIRSCHNER: Objection. I'm
8	sorry, I was going to say, objection, vague.
9	A. Could you clarify what you mean be
10	election-related.
11	Q. Well, do you remember the word
12	election coming up? And by election I mean an
13	American election.
14	A. Right.
15	Q. So I'm not asking about
16	disinformation that relates to an election
17	conducted in what passes for elections in some
18	of these threat actor states, but was there any
19	discussion that related to an American election
20	or elections?
21	A. I don't recall any discussions in
22	American elections in my 2021 meetings with
23	social media companies.
24	Q. How about discussion of mis- or
25	disinformation that relates to American

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1	electoral processes or American elections?
2	A. I don't recall any discussion
3	related to American elections in my 2021
4	meetings.
5	Q. Who is Samaruddin K. Stewart, also
6	known as Sam Stewart?
7	A. Sam Stewart was also a member of
8	the Technology Engagement Team.
9	Q. What was his role on that team?
10	A. His role was to facilitate
11	engagement with social media companies.
12	Q. When was he when did he work for
13	the GEC?
14	A. I don't recall the specific dates
15	of his employment.
16	Q. Is he still there?
17	A. No, I don't believe so.
18	Q. Do you know when he left?
19	A. No.
20	Q. Do you know what timeframe he
21	worked, would it have been back in the 2017/2018
22	timeframe, 2019/2020?
23	A. I believe it was later, sort of
24	2019 to 2021.
25	Q. Okay. And do you know what,

1	exactly, he did for the TET?
2	A. He helped to set up meetings and
3	establish contact with social media companies
4	and technology companies.
5	Q. How did he do that?
6	MR. KIRSCHNER: Objection,
7	speculative.
8	A. E-mails, meetings, phone calls.
9	Q. Okay. Where was he based?
10	A. I believe he was based in
11	Washington, D.C., and and potentially
12	elsewhere. I don't recall exactly where he was
13	based. This overlaps with the COVID period, and
14	I don't I don't recall.
15	Q. Do you were you included in any
16	of the e-mails, meetings, and phone calls he had
17	with social media platforms?
18	MR. KIRSCHNER: Objection,
19	speculative.
20	A. I don't recall any specific
21	e-mails. I may have been included on the
22	scheduling e-mail, but I don't recall any
23	specific e-mails.
24	MR. SAUER: Okay. Can I have G as
25	in goat.

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1	
1	And we're going to hand you a
2	document that's going to be labeled Exhibit 4.
3	(Exhibit No. 4 was marked for
4	identification.)
5	THE WITNESS: Okay.
6	BY MR. SAUER:
7	Q. And is this a media report by
8	Robert K. Ackerman, dated September 4th, 2020?
9	MR. KIRSCHNER: Objection, assumes
10	evidence not in the record, speculative.
11	A. Yes.
12	Q. And if you look in the second page
13	there, there's a reference to Lea Gabrielle; do
14	you see that?
15	MR. KIRSCHNER: I would just ask, I
16	don't want to stay here for an hour reading
17	documents, but can we give the witness a couple
18	minutes to familiarize himself with the document
19	before proceeding with questions?
20	MR. SAUER: Sure. If he needs time
21	he can ask for it.
22	BY MR. SAUER:
23	Q. Do you see a reference to Lea
24	Gabrielle?
25	MR. KIRSCHNER: Well, he he

1	hasn't looked up. He's still looking at the
2	documented. Can you ask the witness if he's
3	ready to answer questions about the document
4	when he has an opportunity to look at it first?
5	BY MR. SAUER:
6	Q. Do you know who Lea Gabrielle is?
7	A. Yes.
8	Q. And who is she?
9	A. She was the appointed coordinator
10	of the Global Engagement Center from February
11	2019 to February 2021.
12	Q. So is she a I take it you
13	reported directly to her; right?
14	A. Yes.
15	Q. And you were the principal deputy
16	coordinator?
17	A. Yes.
18	Q. So you worked closely with her
19	during that time period?
20	A. Yes.
21	Q. If you flip to the second page, can
22	you go down to the it's basically the third
23	full paragraph from the bottom, there's a
24	paragraph that begins with: These three
25	adversaries?

1	MR. KIRSCHNER: Objection. The
2	witness still hasn't identified whether he's
3	ready to proceed with the questions. I would
4	please ask counsel to give an opportunity for
5	the witness to be able to familiarize himself
6	with the document before proceeding with
7	questions.
8	MR. SAUER: He hasn't asked me for
9	more time.
10	BY MR. SAUER:
11	Q. But do you see the paragraph I'm
12	referring to? That's my only question.
13	A. Yes.
14	Q. Okay. And do you see in the second
15	sentence of that paragraph, in the first
16	sentence it refers to Gabrielle's nightmare
17	scenario is propaganda that can lead to, among
18	other things, public health problems; right?
19	A. Yes.
20	Q. And then, in the third sentence, it
21	says: The GEC is countering disinformation on
22	the spread of COVID-19; correct?
23	A. Yes.
24	Q. What steps did the GEC take to
25	counter the spread of disinformation on the

1	spread of COVID-19
2	MR. KIRSCHNER: Objection, assumes
3	evidence not in the record.
4	BY MR. SAUER:
5	Q if any.
6	A. So the GEC tracked propaganda and
7	disinformation by foreign actors, such as Russia
8	and China, that was related to the pandemic.
9	And the GEC worked with partners to counter the
10	effects of that abroad, outside the United
11	States.
12	Q. Okay. What were what were
13	the what was the nature of COVID-related
14	disinformation that originated from, like,
15	Russia and China?
16	A. The nature of it would have been
17	false narratives about the origins of the
18	pandemic, for example, blaming the United States
19	or implicating the US government.
20	Some of it would have been related
21	to the efficacy of, for example, vaccines that
22	the Russian government was developing.
23	And the modes of dissemination
24	would have been various. They could involve
25	bots, they could involve official media. There

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1 was a whole ecosystem of, for example, Russia 2 propaganda, Russian propaganda actors. 3 Tell me about that ecosystem of Ο. Russia. You mentioned China and Russia, so 5 let's start with Russia. You said Russia had misinformation or disinformation about the 7 efficacy of vaccines. What was the nature of that disinformation? 9 The nature of the disinformation 10 would have been to denigrate the effectiveness 11 of western-developed vaccines and to promote the 12 effectiveness of Russian-developed vaccines. 13 Q. Okay. And how is that propa- --14 those kinds of narratives promulgated? 15 Α. The --16 MR. KIRSCHNER: I was going to say, 17 objection, mischaracterizes evidence, and also 18 assumes evidence not in the record. 19 They would utilize the standard Α. 20 toolbox of Russian propaganda and disinformation 21 efforts. So everything from official statements 22 by senior Russian officials to Russian 23 state-funded or controlled media outlets, 24 proxies, online tools, like bots. It would be a whole suite of tools that researchers have 25

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1	documented as as being part of this Russian
2	propaganda and disinformation toolbox.
3	Q. And what steps did the GEC take to
4	combat those tools?
5	MR. KIRSCHNER: Objection, assumes
6	evidence not in the record.
7	A. The primary step, the primary
8	focus, was to expose this effort through things
9	like a public report that the Global Engagement
10	Center released on the pillars of Russian
11	disinformation and the ecosystem that Russia
12	used to promote it.
13	Q. Were there any you say that was
14	the primary focus, was there other aspects of
14 15	the primary focus, was there other aspects of that attempt to counter this Russian
15	that attempt to counter this Russian
15 16	that attempt to counter this Russian disinformation?
15 16 17	that attempt to counter this Russian disinformation? A. Yes. The GEC would act along the
15 16 17 18	that attempt to counter this Russian disinformation? A. Yes. The GEC would act along the major lines of effort that I've described. So
15 16 17 18 19	that attempt to counter this Russian disinformation? A. Yes. The GEC would act along the major lines of effort that I've described. So it would conduct analysis along the lines of
15 16 17 18 19 20	that attempt to counter this Russian disinformation? A. Yes. The GEC would act along the major lines of effort that I've described. So it would conduct analysis along the lines of that report, it would coordinate within the US
15 16 17 18 19 20 21	that attempt to counter this Russian disinformation? A. Yes. The GEC would act along the major lines of effort that I've described. So it would conduct analysis along the lines of that report, it would coordinate within the US government, and it would work with partners to
15 16 17 18 19 20 21 22	that attempt to counter this Russian disinformation? A. Yes. The GEC would act along the major lines of effort that I've described. So it would conduct analysis along the lines of that report, it would coordinate within the US government, and it would work with partners to counter the propaganda and disinformation
15 16 17 18 19 20 21 22 23	that attempt to counter this Russian disinformation? A. Yes. The GEC would act along the major lines of effort that I've described. So it would conduct analysis along the lines of that report, it would coordinate within the US government, and it would work with partners to counter the propaganda and disinformation abroad.

1	foreign governments, research organizations.
2	Q. And what kind of work would be done
3	with those partners or was done?
4	A. Research on Russian propaganda
5	narratives, research on the resonance, the
6	substance, interactions with foreign governments
7	on what they're tracking, for example.
8	Q. Were there any interaction with
9	social media companies about these kinds of
10	Russian disinformation related to COVID-19
11	vaccines?
12	A. I believe that that it would
13	have come up in some of the meetings that I
14	described with the social media companies, yes.
15	Q. So you believe that in those
16	meetings with social media companies, that you
17	described as occurring in 2021, there was
18	discussion of Russian disinformation campaigns
19	related to COVID-19?
20	A. I don't recall in 2021. I believe
21	it was more of a pressing topic a little
22	earlier, when the pandemic was at its height.
23	Q. So that would have been in 2020,
24	most likely?
25	A. 2020, for example.

1	Q. How about other were there other
2	Russia-originated COVID disinformation
3	campaigns, other than the efficacy of the
4	relative efficacy of Russian and American
5	vaccines?
6	A. Yes. I believe there were Russian
7	narratives about the origins of the virus.
8	There were false allegations about US government
9	research facilities. The the there would
10	be a wide array of propaganda narratives.
11	Q. What what would be the what
12	was the nature of the origins of the virus
13	disinformation from Russia?
14	A. I I don't recall the specific
15	narratives. I believe there were some that
16	that alleged a US government role.
17	Q. What sort of role?
18	A. US government funded research or
19	or or some US government role along the lines
20	of the campaign in the 1980s that you
21	referenced.
22	Q. So there was a Russian
23	disinformation campaign that suggested that the
24	US government had some role in creating the
25	COVID-19 virus?

1	A. There were multiple Russian
2	disinformation campaigns, involving a large
3	number of narratives, and that would have been
4	one of the narratives.
5	Q. Was that another narrative that was
6	discussed in those 2020 timeframe meetings with
7	social media platforms?
8	MR. KIRSCHNER: Objection,
9	mischaracterizes testimony, assumes evidence not
10	in the record.
11	A. I don't recall.
12	Q. Now, you do remember that the
13	Russian disinformation about vaccine efficacy
14	was discussed in those meetings; fair to say?
15	A. I don't recall any specific
16	discussions. I it's entirely within the
17	realm of possibility, discussed Russian
18	narratives. I don't recall the specific
19	narratives.
20	Q. Okay. So you believe that you may
21	well have discussed Russian narratives in those
22	2020 meetings with the social media platforms as
23	it pertains to COVID?
24	A. Yes, it's possible.
25	Q. And you don't remember which

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1	specific Russian narratives were discussed?
2	A. No, I don't.
3	Q. How about Chinese narratives that
4	relate to COVID. You referred to those earlier.
5	What are those?
6	A. So those would be also focused on
7	the origins of the virus, also touting China's
8	effective response to the to the pandemic,
9	and contrasting that favorably to other
10	countries, including the United States on
11	those would be two Chinese narratives related to
12	the pandemic.
13	Q. What did the Chinese disinformation
14	say about the origins of the virus?
15	A. I don't recall, specifically. I
16	believe that it was also insinuating, in some
17	cases, a non-Chinese origin of the virus, much
18	along the lines along the lines of what
19	Russian propaganda insinuated.
20	Q. Did it insinuate a US government
21	role or an American role of the origins of the
22	virus?
23	A. I don't recall the specific
24	narratives, no.
25	Q. Do you know whether those Chinese

1	narratives were discussed in relation to the
2	social media companies?
3	A. I don't recall the narratives. I
4	believe we were focused on some of the
5	techniques that China was using, a little bit
6	more than the content of the narratives, so
7	botnets, for example.
8	Q. So did you, for example, tell them
9	that the Chinese were using bots to spread
10	narratives?
11	A. I don't know whether we told them.
12	I know that we discussed Chinese use of bots.
13	Q. Okay. What did you say about the
14	Chinese use of bots?
15	A. That they were using them.
16	Q. Okay. And how about Russia, what
17	was discussed about Russian disinformation, to
18	your recollection?
19	A. I believe it would have been the
20	narratives, and that it would that I already
21	mentioned.
22	Q. So with respect to Russia,
23	narratives were discussed, whereas, with respect
24	to China, to your recollection, techniques were
25	discussed, like using bots as opposed to

1	narratives?
2	A. Yes, because one of the notable
3	features of the pandemic was that China began to
4	adopt techniques that we had previously really
5	only seen Russia use. So, for example, Russia
6	has been documented in many reports as using
7	aggressive online tactics, proxies, bots,
8	trolls. China had not been as active in that
9	way.
10	And so during the pandemic we began
11	to see both the convergence of narratives
12	between China and Russia and a convergence of
13	techniques.
14	So those were things that that
15	we and other researchers were seeing during the
16	pandemic.
17	Q. See, when you say a convergence,
18	you mean a convergence between what Russia and
19	China are both doing?
20	A. Yes, a convergence both of
21	narratives and the techniques for disseminating
22	those narratives.
23	Q. And maybe this piggybacks on if
24	you can look back at that document, the very
25	next sentence or the next part of that sentence,

1	it says: The GEC is countering disinformation
2	on the spread of COVID-19 and China already has
3	tried to discredit US vaccine efforts; do you
4	see that?
5	A. Yes.
6	Q. Do you recall narratives from China
7	that were trying to discredit US vaccine
8	efforts?
9	A. I don't recall specific narratives,
10	but I do recall that China was disseminating
11	narratives that tried to discredit US vaccine
12	efforts.
13	Q. Do you know if those were similar
14	to the Russian narratives that you described a
15	moment ago?
16	A. I believe that they they were,
17	they may have differed in some specifics, but
18	yes.
19	Q. And were those narratives about
20	vaccine efficacy discussed in the meetings with
21	social media platforms during, as you said, the
22	height of the pandemic?
23	A. I I don't recall the specific
24	discussions.
25	Q. So you don't know for sure, is that

1	something that could well have been raised in
2	those meetings?
3	MR. KIRSCHNER: Objection,
4	speculative.
5	A. Yes, it is.
6	MR. SAUER: Can you get H?
7	Let's hand you a document that
8	we're going to label Exhibit 5.
9	(Exhibit No. 5 was marked for
10	identification.)
11	BY MR. SAUER:
12	Q. Do you recognize Exhibit 5?
13	A. I do.
14	Q. And is this a GEC special report
15	called: Pillars of Russia's Disinformation and
16	Propaganda Ecosystem?
17	A. Yes.
18	Q. And this report, I think, was
19	singled out for particular praise in your recent
20	OIG report; is that fair to say?
21	A. I believe so.
22	Q. Can you turn to page 8. You see
23	how I'm kind of turning it sideways, and there's
24	five graphics.
25	On the far right graphic, under

1	Cyber Enabled Disinformation, what is cyber
2	enabled disinformation?
3	A. It's using cyber tools to
4	disseminate disinformation.
5	Q. And what what are some examples
6	of cyber enabled disinformation by foreign
7	actors?
8	A. So these would be listed beneath
9	it, for example, hacking into a system, taking
10	data out of that system and releasing it into an
11	online environment, that would be an example of
12	cyber enabled disinformation.
13	Q. Okay. And so could you give
14	example of when that's ever happened, without
15	straying into any sensitive areas?
16	A. I believe an example would be
17	the I believe this is documented in either
18	the senate intelligence committee report or
19	another congressional report would be the
20	Russian hacking of the DNC e-mails, and then the
21	subsequent release, that would be an example of
22	a hack and release operation.
23	Q. Okay. So and that's that's
24	what happened in 2016, I believe?
25	A. I believe so.

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1	Q. That's a situation where Russian
2	foreign actors just hacked into the DNC's
3	e-mails and then publicly released them on
4	Wikileaks or something like that; right?
5	A. Yes.
6	Q. Or they publicly released them in
7	some form, it's fair to say?
8	A. Publicly released them in some
9	form.
10	Q. Is that a disinformation campaign?
11	How is that a form of disinformation?
12	A. It can be if the information is
13	altered, it can be if the context is
14	misrepresented, it it it depends very much
15	on the context.
16	Q. Can you are there other examples
17	of hack and release operations that the GEC has
18	tracked?
19	MR. KIRSCHNER: Objection,
20	mischaracterizes evidence, assumes evidence not
21	in the record.
22	A. The GEC did not track any of the
23	2016, it hadn't been established with the
24	mandate to do so.
25	Q. Are there examples of hack and

1	release operations since then, that the GEC has
2	focused on?
3	A. Not that I recall right now. You
4	know, this this is focused on the techniques,
5	not specific operations.
6	Q. And without identifying any
7	specific operations, from your five-year period
8	at GEC, do you recall any hack and release
9	operations, other than the 2016 hack by Russians
10	of the DNC's e-mails?
11	A. Without getting into specifics, I
12	do recall internal discussions about Russian
13	hacking, yes.
14	Q. Okay. It was were the
15	discussions of Russian hacking that relate to
16	incidents other than the 2016 hacking incident
17	that you described?
18	A. Yes.
19	Q. Okay. I don't want to get into
20	specifics, but what in what timeframe were
21	you focused, if you can say, what timeframe was
22	there other concerns about specific issues of
23	potential Russian hacking?
24	A. Concern over Russian hacking would
25	have been ongoing throughout the period of the

1	GEC's mandate.
2	Q. How about, is there any other
3	than a general concern for it arising from
4	obviously a very high profile hack that you
5	referred to, was there concern that other
6	incidents of hacking and releasing may have
7	occurred?
8	A. Yes, there was concern.
9	Q. Okay. And were there actual hack
10	and release operations that succeeded?
11	Presumably it's released, it's probably now a
12	matter of public record if they did succeed.
13	MR. KIRSCHNER: Objection, to the
14	extent that this is calling for classified
15	information, defer to the witness on this, but
16	I I do want to make sure that we or law
17	enforcement information, I want to make sure we
18	stay clear of that.
19	So I will instruct the witness not
20	to answer to the extent that this calls for
21	classified or law enforcement material.
22	A. The GEC, itself, doesn't have the
23	tools to track things like hacking operations.
24	We would have followed reporting from those
25	who who did have those tools and those

1	priorities.
2	Q. Okay. And you say is that public
3	reporting or would that be internal government
4	reporting?
5	A. Potentially both.
6	Q. What public reporting would you
7	have followed?
8	A. Media reports.
9	Q. Do you remember media reports
10	relating to Russian hacking that addressed any
11	incident other than the 2016 DNC Russian hack?
12	A. I don't recall anything specific,
13	no.
14	Q. You mentioned hack and release
15	incidents in your report as a technique used by
16	the Russians. Did you have a basis for
17	identifying that as a technique that they used,
18	other than the 2016 DNC hack?
19	MR. KIRSCHNER: Objection,
20	mischaracterizing the evidence, the testimony.
21	A. I I don't recall. I didn't do
22	the base basic research for this report. I
23	don't recall.
24	Q. Do you know do you know what the
25	basis was for identifying them in this report?

1	By them, I mean hack and release techniques.
2	A. I believe it's footnote 16, here.
3	So we could look in the report.
4	Q. Yeah, can you flip to the next page
5	where footnote 16 occurs?
6	A. Mm-hmm.
7	Q. It's page 9.
8	I think there's two things cited
9	there, one is a US Department of Justice report
10	on the investigation into Russian interference
11	in the 2016 presidential election; do you see
12	that?
13	A. Yes. Yes.
14	Q. And does that refer to that 2016
15	hack, high profile hack?
16	A. Yes.
17	Q. And then, underneath it, there's a
18	government of the Netherlands, Netherlands
19	defense intelligence and security service
20	disrupts Russian cyber operation targeting OPCW.
21	Do you know what OPCW is?
22	A. It's the organization for the
23	it's about chemical weapons. It's a chemical
24	weapons focused.
25	Q. Okay.

1	A. I don't recall the exact acronym.
2	Q. Gotcha. Other than those two
3	incidents cited in the footnote, can you recall
4	any other incidents that would have supported
5	the report's conclusion that hack and release is
6	a disinformation technique used by Russia?
7	A. No.
8	Q. Do you remember any conversation
9	you had with that technique of hack and release
10	with any social media platform?
11	A. No.
12	Q. Do you recall that being discussed
13	by any that technique, hack and release,
14	being used by or being discussed by anyone else
15	at the GEC in any social media platform?
16	A. No.
17	MR. SAUER: Let's do I.
18	And this is going to be labeled
19	I think we're on Exhibit 6.
20	(Exhibit No. 6 was marked for
21	identification.)
22	BY MR. SAUER:
23	Q. Do you recall participating in an
24	interview or panel discussion at the Brookings
25	Institution on October 2nd, 2020?

1	A. Yes.
2	Q. Okay. And rather than play the
3	entire video, we got a little excerpt here of
4	comments you made about minute 29.
5	A. Mm-hmm.
6	Q. Can you look at that? There's a
7	question from Fiona Hill and then answered by
8	you; correct?
9	A. Yes.
10	MR. KIRSCHNER: Objection, assuming
11	evidence not in the record or lack of
12	foundation.
13	BY MR. SAUER:
14	Q. This document
15	MR. KIRSCHNER: Let me just make
16	the record clear. Lack of foundation.
17	BY MR. SAUER:
18	Q. This document kind of reports you
19	saying, in this online video on YouTube,
20	basically discussing government coordination;
21	fair to say?
22	A. Yes.
23	Q. And you say it doesn't have an
24	exciting visible component; correct?
25	A. Yes.

1	Q. And it consists of e-mails and
2	phone calls and meetings; right?
3	A. Yes.
4	Q. And you say: We are in close
5	communication with our colleagues at DHS; right?
6	MR. KIRSCHNER: Objection, lack of
7	foundation. We don't have the full context.
8	Just objection to this entire line of
9	questioning on this exhibit as lacking
10	foundation.
11	BY MR. SAUER:
12	Q. And you go on to say: We're in
13	close communication with our colleagues at DHS;
14	correct?
15	A. Yes.
16	Q. What was the nature of the
17	communication that you're referring to there
18	when you made this statement?
19	A. E-mails.
20	MR. KIRSCHNER: Objection, assuming
21	evidence that's not in the record.
22	A. E-mails, phone calls and meetings.
23	Q. Okay. What kind of coordination,
24	back in that late 2020 timeframe, what kind of
25	close communication was going on with colleagues

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1	at DHS?
2	A. Communication related to the GEC's
3	mandate to counter foreign propaganda
4	misinformation.
5	Q. Who at DHS was GEC communicating
6	with?
7	MR. KIRSCHNER: Objection, asked
8	and answered.
9	A. It would have been primarily the
10	office, either I don't recall what it was
11	called, at the time, but the task force or
12	what's I believe now known as the
13	misinformation, disinformation and
14	mal-information office.
15	Q. So that's the mis-dis- and mal
16	information team we talked about earlier?
17	A. Right.
18	Q. And this October 2nd, 2020 is about
19	a month before the 2020 election?
20	A. Right.
21	Q. Who was communicating between GEC
22	and DHS in that timeframe?
23	MR. KIRSCHNER: Objection, assuming
24	evidence not in the record.
25	A. I don't recall the specific staff

1	members who would have done that.
2	Q. Would you have been involved in
3	those communications?
4	A. Generally not, not the direct
5	communications, no.
6	Q. Do you remember what your basis was
7	for saying that we're in close communication
8	with our colleagues at DHS?
9	MR. KIRSCHNER: Objection, assuming
10	evidence not in the record, lack of foundation.
11	A. It would have been meetings with
12	the head of the relevant interagency team at the
13	GEC or meetings where the person from that team
14	would report on other agencies that they were in
15	communication with, so they would list that
16	we're in communication with DHS, for example.
17	Q. Okay. And do you I'm sorry, you
18	may have answered this who at GEC is involved
19	in these meetings?
20	MR. KIRSCHNER: Objection, assuming
21	evidence not in the record, mischaracterizes
22	testimony, vague.
23	A. It would be the staff from the I2C2
24	or potentially someone with relevant subject
25	matter expertise from one of the threat teams at

_	
1	GEC.
2	Q. And do you know what was discussed
3	in those meetings of close communication with
4	DHS in the October 2020 timeframe?
5	MR. KIRSCHNER: Objection,
6	mischaracterizes his testimony, assumes evidence
7	not in the record, lack of foundation.
8	A. No, not specifically.
9	Q. You just don't remember what was
10	discussed in those meetings?
11	MR. KIRSCHNER: Objection,
12	mischaracterizes testimony, assumes evidence not
13	in the record.
14	A. It wouldn't be there wouldn't be
15	any reason to report the content of a specific
16	communication to the principal deputy
17	coordinator.
18	Q. Who would we have to ask to know
19	what was said in those meetings?
20	MR. KIRSCHNER: Objection,
21	speculative.
22	A. The staffers involved.
23	Q. And you think those staffers would
24	have been people in the TET or the I2C2 sorry
25	I2C2?

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1	MR. KIRSCHNER: Objection,
2	speculative.
3	A. It could be the I2C2 team, but it
4	could be anyone with relevant subject matter
5	expertise at the GEC.
6	Q. Who was in charge of the I2C2 team
7	at this time?
8	A. I believe it was Stevie Hamilton,
9	but it may have been somebody else. I don't
10	remember the exact dates of all of the heads of
11	all the teams.
12	Q. Is that a matter of public record
13	who's in charge of the I2 I2C2 team?
14	A. I don't believe so. I don't think
15	that the GEC provides information below the
16	level of coordinator on who's in charge of which
17	team.
18	Q. Who has been in charge of the I2C2
19	team during your tenure there?
20	A. I believe it was Stevie Hamilton.
21	Q. The whole time?
22	A. I believe so. There may have
23	been there was a lot a lot of staff
24	movement. I believe it was Stevie Hamilton.
25	Q. Do you remember anyone else being

1	in charge of that team?
2	A. I don't recall.
3	Q. The next sentence in this Exhibit 6
4	says: With our colleagues at FBI, the Global
5	Engagement Center has set up an interagency
6	coordination cell; do you see that?
7	A. Yes.
8	Q. Is that a true statement?
9	A. I believe that we set up an
10	interagency coordination cell that was in
11	contact with the FBI. So I would I would
12	I would clarify it that way.
13	Q. What is an interagency coordination
14	cell? I mean, what does that mean?
15	A. So an interagency coordination cell
16	is a team with, say, a number of members, and
17	each one will be responsible for contact with
18	one or more agencies in the interagency.
19	So you have an individual whose job
20	it is to stay in contact with components in the
21	intelligence community or the Department of
22	Defense or DHS. That's what an interagency
23	coordination cell would be.
24	Q. So someone whose who's tasked with
25	remaining in fairly close contact with another

1	close counterpart at another agency?
2	A. Yes, with the clarification that it
3	may be sporadic, it may be close, it could
4	depend on events, it could depend on what's
5	happening. It can be difficult to predict how
6	close it is.
7	The primary engagements for the
8	Global Engagement Center were really with the
9	Department of Defense and the intelligence
10	community.
11	Q. Without mentioning their names or
12	by title, do you know who at the or role
13	do you know who at the GEC was involved in this
14	interagency coordinating cell with with the
15	FBI?
16	A. No, I don't recall.
17	Q. Do you know what team they would
18	have been on?
19	A. I believe it would have been the
20	I2C2 team.
21	Q. So you believe someone this
22	interagency coordinating cell means someone at
23	IC I2C2 is designated to be in in close
24	contact with someone in the FBI?
25	A. Yes, there would be someone with a

1	portfolio that includes FBI for coordination.
2	Q. And then who on the FBI side would
3	they have did they coordinate with, to your
4	knowledge?
5	MR. KIRSCHNER: Objection,
6	speculative.
7	BY MR. SAUER:
8	Q. And again, not names, I just want
9	to know their title and role.
10	A. I don't know their title.
11	Q. Okay. Do you know what their role
12	would have been or what office or section they
13	would have been involved in?
14	MR. KIRSCHNER: Objection,
15	speculative.
16	A. I believe it would be the foreign
17	influence task force at the FBI.
18	Q. So you believe does that is
19	that ongoing to this day, is there still an
20	interagency coordinating cell between GEC and
21	can I call it the FITF?
22	A. Sure.
23	Q. The FBI? Is that ongoing to this
24	day?
25	A. I believe there is an interagency

1	cell at the GEC. I don't know which other
2	agencies it's in contact with now or the
3	frequency of those contacts.
4	Q. There is an interagency cell at the
5	GEC, but you don't know whether or not that
6	interagency cell is in contact with the FBI now?
7	A. Yes, that's correct.
8	Q. But I take it, they were in contact
9	with the FBI during October of 2020, when you
10	gave the talk at the Brookings Institute?
11	MR. KIRSCHNER: Objection, assumes
12	evidence not in the record, mischaracterizes
13	testimony.
14	A. I don't know whether they were in
15	contact in October 2020. But when I was giving
16	these remarks the I2C2 would have had someone
17	with FBI in their profile. And if the
18	circumstances required they would be in touch
19	with a counterpart at the FBI.
20	Q. Do you know whether there were any
21	such communications during that timeframe?
22	A. I don't.
23	Q. And you go on to say: So we are in
24	constant communication, in the next sentence of
25	Exhibit 6; do you see that?

1	A. Yes.
2	MR. KIRSCHNER: Objection.
3	BY MR. SAUER:
4	Q. What's that a reference to, the
5	constant communication?
6	MR. KIRSCHNER: Objection, lack of
7	foundation, assumes evidence not in the record.
8	BY MR. SAUER:
9	Q. On your understanding?
10	A. It's a reference to the GEC's
11	exercise of it's interagency coordination
12	mandate, which requires communications with the
13	relevant agencies.
14	Q. And that's done through the I2C2's
15	coordination cell to communicate with the FBI?
16	A. Yes. The I2C2 is specifically
17	focused on interagency communication, but it
18	could involve anyone with relevant subject
19	matter expertise.
20	Q. Do you know anyone let me ask
21	you this: Do you recall any issues that the GEC
22	raised with the FBI's FITF at any time, without
23	saying what the issues are, do you know whether
24	there were issues that the GEC raised with the
25	FITF?

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1	A. I don't recall any specific issues,
2	no.
3	Q. Is it possible that they did and
4	you just don't remember or do you believe that
5	they never did raise an issue with the FITF?
6	MR. KIRSCHNER: Objection,
7	speculative.
8	A. It's possible that they raised an
9	issue with the FBI, yes.
10	Q. And they being someone within the
11	I2C2?
12	A. Yes.
13	Q. Okay. But you just don't know what
14	sort of communication?
15	A. No, I don't.
16	MR. KIRSCHNER: Objection,
17	mischaracterizes testimony.
18	BY MR. SAUER:
19	Q. More generally sorry, you can
20	answer that question.
21	A. I I don't recall.
22	Q. Okay. Do you recall any
23	interaction, any substantive interaction,
24	between FITF and the GEC?
25	A. I don't recall any substantive

1	interaction. There were just a lot of different
2	meanings. I don't recall anything specific and
3	substantive.
4	Q. Did you ever interact with FITF?
5	A. I believe I may have been in the
6	context of an interagency meeting with with
7	representatives of I think they call it FITF or
8	FITF, but I don't recall any specific meetings.
9	Q. Was that a when you say an
10	interagency meeting, was there a an
11	essentially GEC/FITF meeting?
12	A. I don't recall a GEC/FITF meeting.
13	I mean a broader interagency meeting, where one
14	of the representatives would have been FBI, for
15	example.
16	Q. Do you know who's in charge of
17	FITF?
18	A. I don't know who's in charge of
19	FITF, no.
20	Q. Other than what we've just now
21	talked about, are you aware of any interactions
22	between GEC and FITF?
23	A. I'm not aware of any specific
24	interactions. As I said, in the interagency,
25	it's entirely possible that we would have been

1	in meetings together, yes.
2	Q. Do you remember anything about
3	those meetings?
4	MR. KIRSCHNER: Objection,
5	mischaracterizes testimony and assumes evidence
6	not in the record.
7	A. I don't recall any specific items
8	involving FITF, no.
9	MR. SAUER: Let me give you another
10	exhibit. I've got this one. I think this is
11	going to be 7, right?
12	(Exhibit No. 7 was marked for
13	identification.)
14	MR. KIRSCHNER: Counsel, do you
15	know how long you're going to spend on this
16	exhibit? I'm just trying to think in terms of a
17	possible lunch break.
18	MR. SAUER: Oh, well, if we go for
19	about five minutes?
20	MR. KIRSCHNER: Okay.
21	MR. SAUER: We can revisit it. I'm
22	not sure, but once we're done with this exhibit
23	why don't we raise that?
24	MR. KIRSCHNER: Okay. I just
25	didn't know if you were going to spend an hour

1	on one exhibit. I just
2	MR. SAUER: My exhibits are like my
3	children. I love them all equally.
4	BY MR. SAUER:
5	Q. Mr. Kimmage, I've handed you've
6	been handed Exhibit 7, which is excerpts from
7	the second amended complaint in this case.
8	Have you ever reviewed the second
9	amended complaint?
10	A. Yes, I have looked at this.
11	Q. So you've seen this before, this
12	document before, or you've seen the big
13	document, this is obviously only 14 pages of the
14	162 page?
15	A. Yes.
16	Q. Fair to say you've seen it before?
17	A. Yes.
18	Q. Can you flip to page 117?
19	A. Mm-hmm.
20	Q. And look at paragraph 396.
21	A. Mm-hmm.
22	Q. And there's a there's an
23	allegation in paragraph 396 that says: Pursuant
24	to third-party subpoena, Twitter has identified
25	personnel associated with the State Department's

1	Global Engagement Center, including Alexis
2	Frisbee and Daniel Kimmage, as likely involved
3	in communications with Twitter about censorship
4	and/or content modulation on issues such as
5	election integrity, vaccines/COVID
6	misinformation, and related subjects; do you see
7	that?
8	A. I see that.
9	Q. Do you know what if to the
10	extent Twitter said that about you, do you know
11	what they were referring to? Do you remember
12	any meetings with Twitter?
13	MR. KIRSCHNER: Objection, lack of
14	foundation.
15	BY MR. SAUER:
16	Q. Let's start with the first
17	question.
18	Do you remember meetings with
19	Twitter?
20	A. I recall at least one meeting with
21	Twitter.
22	Q. Do you remember any other meetings
23	besides the one?
24	A. Yes, I recall at least two meetings
25	with Twitter.

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1	Q. Okay. Do you recall any besides
2	those two?
3	A. No, I do not.
4	Q. When did those meetings occur?
5	A. One was in 2021, and one would have
6	been before the pandemic.
7	Q. Would that have been in 2019 or
8	late 2020?
9	A. Potentially 2019 or even 2018. I
10	don't recall the date.
11	Q. Okay. The 2021 meeting, let's
12	start with that, what what do you know
13	what time of year that happened?
14	A. It would have been in the spring, I
15	believe.
16	Q. Do you remember more specifically
17	what date it was?
18	A. No, I don't.
19	Q. Would that be reflected on your
20	official calendar?
21	A. I believe it would be, yes.
22	Q. Do you know who attended that
23	meeting?
24	A. It would be the acting coordinator,
25	me, in that capacity, then one or more of the

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1	deputy coordinators, team chiefs from the Global
2	Engagement Center, and working-level staff with
3	relevant subject matter expertise.
4	Q. So a significant number of
5	individuals on the GEC side were at that
6	meeting?
7	MR. KIRSCHNER: Objection,
8	mischaracterizes testimony, assumes evidence not
9	in the record.
10	A. How would you define significant?
11	Q. Well, how many people on the GEC
12	side would you estimate?
13	A. Between five and ten.
14	Q. Okay. And that included you and
15	you were then acting coordinator?
16	A. Yes, in 2021, from February to
17	June, yes.
18	Q. And then the deputy coordinator was
19	there, too?
20	A. I believe so.
21	Q. Who was that?
22	A. At the time, it would have been
23	Leah Bray.
24	Q. And then the team chief, who's
25	that?

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1	A. Patricia Watts, the Technology
2	Engagement Team.
3	Q. So that was a TET team?
4	A. The TET, right.
5	Q. And was there anyone else from the
6	TET there?
7	A. I believe Alexis Frisbee.
8	Q. Okay. How about you mentioned
9	subject matter experts?
10	A. Right.
11	Q. Who do you remember I don't
12	necessarily want their well, let me ask this:
13	What unit did they come from?
14	A. I don't recall for the 2021
15	meeting.
16	Q. Do you know was Russia maybe?
17	A. I simply don't remember who all the
18	GEC personnel were.
19	Q. Okay. And then who was present at
20	that meeting on the Twitter side?
21	A. I I don't remember the
22	individual.
23	Q. There's only one person?
24	A. No, there were others, but I don't
25	remember their names.

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1	Q. Okay. Do you remember what their
2	
	roles were within Twitter?
3	A. I believe it was the the sort of
4	assurance or compliance. I don't recall the
5	exact name of the component within Twitter.
6	Q. When you say assurance or
7	compliance, what is that, a member of the trust
8	and safety team?
9	A. It may have been, yes.
10	Q. Does that sound right to you, at
11	least?
12	MR. KIRSCHNER: Objection,
13	speculative.
14	A. Yes.
15	Q. If you know? Is that a yes?
16	A. Yes.
17	Q. To the best of your recollection,
18	someone from the trust and safety team was
19	there?
20	A. Yes.
21	Q. Do you know if it was a man or a
22	woman?
23	A. No.
24	Q. And you you do you believe
25	there were other members of Twitter there or

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1	Twitter officials?
2	A. Yes.
3	Q. How many, would you say?
4	A. Fewer than on our side.
5	Q. Were they so maybe less than
6	five?
7	A. Yes.
8	Q. And there would be a on your
9	official calendar, if there were an there's
10	an invite for this meeting; correct?
11	A. Yes.
12	Q. And that would reflect all the
13	participants; fair to say?
14	MR. KIRSCHNER: Objection,
15	speculative.
16	A. I I
17	MR. KIRSCHNER: Lack of foundation.
18	A. I don't know how the invite is
19	structured
20	Q. Okay.
21	A and what it reflects.
22	Q. Let me ask you this: Were there
23	other individuals from Twitter, there? Do you
24	remember any of their names?
25	A. No.

1	Q. Do you remember any of their roles
2	within Twitter?
3	A. I believe their roles were in
4	the the trust and safety area.
5	Q. So there would be multiple Twitter
6	officials from the trust and safety group there?
7	A. Yes, I believe so.
8	Q. How about any other area of
9	Twitter, you know, did anyone else attend that
10	wasn't a trust and safety person?
11	A. Not that I recall.
12	Q. Who asked for this meeting, was
13	it did GEC ask for it or did Twitter ask for
14	it?
15	A. I I don't recall where the exact
16	impetus came from, which side initiated, which
17	side asked for the meeting.
18	Q. Okay. Was this a recurring meeting
19	or was it kind of a standalone meeting that had
20	been set up to address a specific topic?
21	A. As I said, we had we hoped to
22	set up recurring quarterly meetings. I don't
23	recall whether this one was was a
24	continuation, as in whether the same people were
25	there from our side. I was only recently in the

1	role of acting coordinator, because before that
2	there was an appointed coordinator.
3	Q. Who was that?
4	A. That was Lea Gabrielle, the
5	appointed coordinator before the
6	Q. Okay. So what was discussed in
7	this meeting?
8	A. So as I said, in this meeting the
9	GEC would provide an overview of what it was
10	seeing in terms of foreign propaganda and
11	disinformation. And Twitter would, to the
12	extent that they felt comfortable sharing
13	information, would discuss similar topics.
14	Q. And you said would?
15	A. Right.
16	Q. Did you you said you would
17	provide it, and they would share, in fact,
18	did did you guys do that?
19	A. I recall that we gave an overview.
20	I don't recall the specifics of what Twitter
21	presented.
22	Q. What did what did you get an
23	overview of?
24	MR. KIRSCHNER: Objection, calls
25	for a narrative response.

1	A. I believe it was an overview of the
2	major actions by malign foreign actors, like
3	Russia, China, and terrorist organizations.
4	Q. Do you remember what was discussed
5	about that?
6	A. I I I don't.
7	Q. Who was the principal speaker in
8	this meeting, on your side, or was there?
9	A. The the GEC side had multiple
10	speakers. I believe I kicked things off with
11	sort of very general remarks, and then there
12	were there were other other speakers at
13	the GEC.
14	Q. Did Alexis Frisbee talk?
15	A. I don't I don't recall whether
16	she had a speaking role.
17	Q. Who who else talked, to your
18	recollection?
19	A. I I don't recall the specifics
20	of the meeting.
21	Q. Okay. You don't remember how many
22	people talked?
23	A. No, I don't.
24	Q. Do you remember any content about
25	the conversation?

1	A. No, I don't remember the specifics.
2	Q. I think if you look back to
3	paragraph 396, there's a specific reference to
4	certain topics.
5	A. Mm-hmm.
6	Q. Election integrity, is that
7	something that was discussed at this meeting?
8	MR. KIRSCHNER: Objection, vague.
9	BY MR. SAUER:
10	Q. If you remember.
11	A. I don't I don't recall.
12	Q. Do you remember anything said at
13	the meeting that would have related to elections
14	in any way?
15	A. I don't recall.
16	Q. How about vaccine/COVID
17	misinformation, do you remember anything that
18	would have related to that in a spring 2021
19	meeting with Twitter?
20	A. I I I just don't recall the
21	specifics of the meeting.
22	Q. How about your own statements of
23	the meeting, do you remember anything that you
24	said at this meeting? I know you said earlier
25	you kicked things off, it sounds like you

1	introduced some speakers; did you say anything
2	else at the meeting?
3	A. I don't recall the specifics. I
4	would have introduced our team, and talked a bit
5	about sort of general trends and propaganda and
6	disinformation, but I don't I simply don't
7	recall the specifics.
8	Q. So you don't remember anything
9	specific about what you personally said in that
10	2021 meeting?
11	A. No, I don't. I would have been
12	doing multiple meetings every day. I just don't
13	recall the specifics.
14	Q. And you say multiple meetings every
15	day, is that with social media platforms in this
16	timeframe?
17	A. No, no, it would have just been
18	multiple meetings in my capacity as the acting
19	coordinator.
20	Q. Did you have a similar meeting to
21	this one, with Facebook or YouTube or any
22	others?
23	A. I believe we had meetings with
24	either Facebook or Google or both. I don't
25	remember the specifics, but there were I

1	believe there were meetings with Facebook and
2	Google.
3	Q. Would they be in that same
4	timeframe?
5	A. They would be in the same period
6	when I was the acting coordinator, yes.
7	Q. So in the spring 2021 timeframe?
8	A. Yes.
9	Q. And I think you testified earlier
10	that you were acting coordinator from February
11	to
12	A. June.
13	Q June? Okay.
14	And you believe you had at least
15	one meeting with Facebook and Google that was
16	similar to this meeting with Twitter that we
17	have been talking about?
18	MR. KIRSCHNER: Objection,
19	mischaracterizes testimony.
20	A. I believe we we met with
21	them, yes.
22	MR. SAUER: Apparently I didn't
23	mischaracterize it.
24	MR. KIRSCHNER: Those were
25	different statements. He said something

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1	different than what you said.
2	BY MR. SAUER:
3	Q. Did you have a similar meeting with
4	Facebook and Google, during this timeframe, that
5	was similar to the meeting you had with Twitter?
6	A. I believe so, I don't recall the
7	specifics of which which company we met with.
8	Q. So you're not sure whether you met
9	with Facebook?
10	A. I believe we did. I don't I
11	don't recall, exactly. I believe we met with
12	Facebook.
13	Q. Do you remember who at Facebook you
14	met with or what their roles were?
15	A. I don't remember the individual. I
16	believe it was a similar area. I don't remember
17	what it was called at Facebook. But it was a
18	similar similar to the component at Twitter,
19	the assurance or safety part of Facebook.
20	Q. Right. So at Twitter we described
21	it as the trust and safety team
22	A. Right.
23	Q correct?
24	A. Yes.
25	Q. And then at Facebook you believe

1 yo ı	net with the analogous component of Facebook
2 in	your meeting in 2021; fair to say?
3	A. Yes, I believe it was the analogous
4 con	mponent.
5	Q. But you don't remember exactly how
6 the	ey described it, but it had similar
7 res	sponsibility to the Twitter trust and safety
8 tea	am; correct?
9	A. I don't recall how they described
10 it,	, and I don't know what its internal
11 res	sponsibilities are at Facebook.
12	Q. Okay. Okay. But you believe it
13 was	s the similar or analogous component to the
14 Tw i	itter trust and safety team; fair to say?
15	A. I believe so, it may have been
16 puk	olic policy, that was another component.
17	Q. How about Payton Iheme, is that a
18 na r	me you recognize from Facebook?
19	A. No.
20	Q. And then you also had believe
21 yo u	had a meeting with Google or, slash, YouTube
22 in	that same timeframe?
23	A. I believe so, yes.
24	Q. And would that have been with the
25 san	me components, the kind of trust and safety

1 type component at YouTube/Google?
2 A. I believe it would have been
3 analogous component, yes.
Q. Okay. Do you know how many
5 representatives came from Facebook to your
6 meeting?
7 MR. KIRSCHNER: Objection, assumes
8 evidence not in the record.
9 A. No. A handful.
Q. Okay. And then on the GEC side,
did you have a a series of or sorry did
you bring similar people on the GEC side to that
13 Facebook meeting?
14 MR. KIRSCHNER: Again, objection,
15 assumes evidence not in the record.
16 A. Yes, I believe the lineup would
17 have been similar.
Q. Have you taken any steps, since you
read this document for the first time, to
20 refresh your recollection about these meetings?
21 A. No.
Q. Have you reviewed any documents in
23 preparation for your deposition.
24 A. No.
Q. So you read this, but you didn't go

1	check and see, oh, did I have a meeting with
2	Twitter? You didn't take any steps to refresh
3	your recollection to try and see what was
4	discussed at that meeting?
5	A. No, I did not.
6	Q. And you haven't reviewed a single
7	document in preparation for your testimony
8	today?
9	A. No. I looked at this when it came
10	out.
11	Q. How about vaccine COVID
12	misinformation, we talked about that statement
13	in paragraph 396, about election integrity, how
14	about vaccine COVID misinformation, is that
15	something that may have come up in those
16	meetings that meeting with Twitter, to start
17	with?
18	A. Yes. It's it's possible, I I
19	don't recall the specifics.
20	Q. And what kind of vaccine/COVID
21	misinformation might have come up?
22	A. The Global Engagement Center would
23	be looking at disinformation narratives or
24	campaigns by foreign actors, like Russia, China,
25	on on on COVID.

1	Q. And do you remember that coming up
2	in these meetings?
3	A. I don't recall whether it
4	specifically came up at this meeting. I simply
5	don't recall.
6	Q. Do you recall whether there were
7	any e-mails that relate to these meetings,
8	setting them up or having a follow-up or
9	anything like that?
10	MR. KIRSCHNER: Objection,
11	speculative.
12	A. I recall a scheduling invite,
13	that's what I recall.
14	Q. For all three of them?
15	MR. KIRSCHNER: Objection, assumes
16	evidence not in the record.
17	A. I I recall scheduling, I believe
18	the Twitter and maybe the Facebook meeting,
19	because I had to click on a link for the Zoom
20	part of the meeting.
21	Q. Oh, right. But as far as
22	Google/YouTube you're not sure if you had a
23	calendar invite?
24	A. I I I just don't recall
25	everything on the calendar.

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1	Q. You inferred, also, to a meeting
2	
	with Twitter in 2019. Can you tell me about
3	that meeting?
4	A. I believe it was in an initial
5	meeting, after they had set up, like, a policy
6	office in in in D.C., and I don't remember
7	the individual's name, but it was sort of a a
8	meet and greet meeting.
9	Q. Okay. You personally attended
10	that?
11	A. Yes.
12	Q. Were you then acting coordinator or
13	principal deputy coordinator?
14	A. I don't recall whether I was the
15	acting coordinator or the principal deputy. I
16	would have been one of those two positions,
17	depending on the date.
18	Q. Do you know who attended that
19	meeting, other than you?
20	A. No, I don't.
21	Q. Do you know who attended that
22	meeting for Twitter?
23	A. I I don't recall the person's
24	name.
25	Q. Did you have similar meetings in

1	that timeframe with any other social media
2	platforms?
3	A. I don't recall specific meetings.
4	I recall the meeting with with Twitter, but I
5	don't I don't recall other specific meetings.
6	Q. Why does that one stand out in your
7	mind?
8	A. I just remember that Twitter had a
9	new person in Washington, and they were, I
10	think, sort of making the rounds and introducing
11	themselves.
12	Q. Okay. Turning back to the 2021
13	meeting, I think I asked you earlier if you knew
14	whether the GEC had initiated that or whether
15	Twitter had initiated that, I mean, I've asked
16	you a bunch of questions about that, does that
17	jog your recollection at all?
18	A. I I don't know who specifically
19	initiated the the request for a meeting.
20	Q. Do you know whether there was a
21	specific threat that led to the meeting, that
22	one side or the other wanted to raise a specific
23	issue, and that's what led to the meeting?
24	A. No, I don't I don't believe it
25	was was based on a specific threat.

1	Q. And and you believe there were
2	multiple speakers on the GEC side discussing
3	different kinds of threats?
4	MR. KIRSCHNER: Objection, assumes
5	evidence not in the record, mischaracterizes
6	testimony.
7	A. There were multiple speakers not
8	necessarily addressing threats. These meetings
9	were not threat-focused, they were more general
10	than that.
11	Q. What were they focused on?
12	A. Propaganda narratives disseminated
13	by foreign actors, like Russia and China.
14	Q. Okay. And do you remember what
15	narratives were discussed?
16	MR. KIRSCHNER: Objection, assumes
17	evidence not in the record, mischaracterizes
18	testimony.
19	A. I I don't recall the specific
20	Russian or Chinese campaigns we would have been
21	discussing in the spring of 2021.
22	Q. Do you believe you were discussing
23	Russian and Chinese disinformation campaigns at
24	that meeting in 2021 with Twitter?
25	MR. KIRSCHNER: Objection,

1	speculative.
2	A. Yes, I I believe we would have,
3	we would have discussed those, yes.
4	Q. Would you also have discussed
5	techniques, like, for example, the techniques
6	that are discussed in the report that we showed
7	you earlier on Russian disinformation
8	techniques?
9	A. Yes.
10	Q. How many you said there would be
11	multiple speakers, so to speak, from GEC at the
12	Twitter meeting, how many were there on the GEC
13	side?
14	MR. KIRSCHNER: Objection,
15	speculative.
16	A. I believe I answered this, between
17	five and ten.
18	Q. Oh, yes, I think you did. You said
19	there were five attendees?
20	A. On the GEC side.
21	Q. Right. Right. Did everybody talk?
22	Like, did everybody give a little presentation?
23	Was there three of them? That's my question.
24	A. I don't know whether everybody
25	talked. I know that two or three definitely

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1	would have talked.
2	MR. KIRSCHNER: Counsel, we've been
3	going for about fifteen minutes when you said
4	five minutes. So I do want to wrap up this line
5	
	of questioning and then take a break, but I
6	how much longer do you have?
7	MR. SAUER: Why don't we take a
8	break now, and then we can decide over lunch
9	whether we've wrapped up the line of
10	questioning.
11	For the record, I did not say five
12	minutes. I said I didn't know how long it would
13	go.
14	So I'm fine taking a break. We're
15	at a lunch time.
16	MR. KIRSCHNER: Just let's call it
17	1:30 to get actually started.
18	MR. SAUER: I would rather start at
19	1:15. I don't want to I do want to
20	accommodate the
21	THE VIDEOGRAPHER: Want to go off
22	the record?
23	MR. SAUER: Go ahead. Are we off
24	the record?
25	THE VIDEOGRAPHER: The time is

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	_
1	12:23 p.m. We're off the record.
2	(Recess.)
3	THE VIDEOGRAPHER: The time is 1:33
4	p.m. We're back on the record. Please proceed.
5	MR. KIRSCHNER: I'd like to just
6	ask a couple quick clarifying questions for
7	Mr. Kimmage.
8	MR. SAUER: Okay.
9	EXAMINATION
10	BY MR. KIRSCHNER:
11	Q. So Mr. Kimmage, do you remember
12	when counsel asked you if you looked at any
13	documents to refresh your recollection in
14	preparation for this deposition?
15	A. Yes.
16	Q. I just wanted to ask: Do you, upon
17	further memory, remember looking at any
18	documents in preparation of this deposition?
19	A. Yes.
20	Q. And do you know do you remember
21	what those documents were?
22	A. I believe they were court
23	documents.
24	MR. KIRSCHNER: Okay.
25	///

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1	EXAMINATION
2	BY MR. SAUER:
3	Q. What documents did you review?
4	A. The amended complaint, I believe.
5	Q. Anything else?
6	A. Court some other court document,
7	I don't remember precisely which.
8	Q. What did you read in them?
9	A. Versions of the same charges that
10	are here.
11	MR. SAUER: Can we have K?
12	BY MR. SAUER:
13	Q. Did you read a motion for a
14	preliminary injunction?
15	A. I don't recall, exactly.
16	Q. Did you read a joint statement on
17	depositions?
18	A. I don't recall.
19	Q. Did you read anything other than
20	court documents that are publicly filed in
21	preparation for your testimony today?
22	A. No, I didn't read anything else in
23	preparation for the testimony.
24	MR. SAUER: I think you're being
25	handed what's going to be marked Exhibit 8.

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1		(Exhibit No. 8 was marked for
2	identificati	
	Identificati	.011.)
3		MR. KIRSCHNER: Oh, I have it.
4	BY MR. SAUER:	
5	Q.	Do you recognize this document?
6	Α.	Yes.
7	Q.	So is this from the website of the
8	Technology E	ngagement Team within GEC?
9	Α.	It it yes, it looks like it.
10	Q.	Or it's a description of the
11	Technology E	ngagement Team online?
12	Α.	Mm-hmm.
13	Q.	Here on the third page there is a
14	paragraph th	ere on Silicon Valley engagement;
15	correct?	
16	Α.	Mm-hmm. Yes.
17	Q.	And it states that in December 2019
18	GEC/TET esta	blished a Silicon Valley location;
19	correct?	
20	Α.	Yes.
21	Q.	Are you familiar with that
22	location?	
23	Α.	Yes, I believe it was an
24	individual.	
25	Q.	Is that a location related to just

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1	one person?
2	A. Yes.
3	Q. Who's that person?
4	A. I believe it was Sam, I can't
5	remember the last name.
6	
7	Q. Stewart?
	A. Stewart, yes.
8	Q. So earlier when you testified that
9	you thought he worked in D.C. is it possible
10	that that was incorrect?
11	A. He did work in D.C., and then for
12	some portion of that he was also in California,
13	I believe.
14	Q. How long was there a Silicon Valley
15	location?
16	A. I don't I don't recall how long
17	he was actually physically located in Silicon
18	Valley.
19	Q. Is it is someone still there
20	today?
21	A. I don't believe so, no.
22	Q. And this is on your website now;
23	fair to say?
24	A. I haven't reviewed it. I'm not
25	aware.
Ī	

1	Q. Do you know how long that Silicon
2	Valley location, consisting of one person, was
3	in operation?
4	A. No, I don't recall.
5	Q. And the purpose of the Silicon
6	Valley location, according to your website, is
7	to facilitate public/private coordination and
8	broker constructive engagements between the US
9	government and the tech sector, as well as
10	academia and research; correct?
11	A. Yes, that's correct.
12	Q. And the tech sector there, is that
13	a reference, in whole or in part, to social
14	media platforms?
15	MR. KIRSCHNER: Objection,
16	speculative.
17	BY MR. SAUER:
18	Q. If you know.
19	A. It would include potentially social
20	media companies, among other other other
21	tech-related things out there.
22	Q. Does your Silicon Valley engagement
23	person talk to social media platforms?
24	MR. KIRSCHNER: Objection,
25	speculative, assumes evidence not in the record.

	-
1	BY MR. SAUER:
2	Q. If you know.
3	A. Yes.
4	Q. What what what kinds of
5	conversations did they have or what kind of
6	engagement did they conduct?
7	A. Primarily information sharing.
8	Q. What kind of information?
9	A. Information sharing related to the
10	Global Engagement Center's mission to counter
11	foreign propaganda and disinformation.
12	Q. And that next sentence there says:
13	The goal is to increase collaboration that
14	results in identifying, exposing, and defending
15	against foreign adversarial propaganda and
16	disinformation; correct?
17	A. Yes, that's what it says.
18	Q. What's involved in defending a
19	collaborating with social media platforms to
20	defend against disinformation?
21	A. Primarily exchanging information to
22	deepen their understanding of the actions of
23	foreign propaganda and disinformation actors.
24	Q. I'm sorry, say that again. I
25	apologize.

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1	A. Sure. Primarily deepening their
2	understanding of the actions, the tools,
3	techniques of foreign propaganda and
4	disinformation actors.
5	Q. So mostly it's GEC educating the
6	tech companies on those tools and methods?
7	A. Not necessarily, I can't
8	characterize what the balance is
9	Q. Okay.
10	A in the engagements.
11	Q. But the purpose, from your
12	perspective, is to educate them on tools and
13	methods of dissemination of foreign propaganda
14	and disinformation?
15	MR. KIRSCHNER: Objection,
16	mischaracterizes testimony.
17	BY MR. SAUER:
18	Q. Is that fair to say?
19	A. Not necessarily. That would be the
20	primary focus, from the GEC side, but they may
21	also educate us based on what they are seeing.
22	It's I can't characterize the exact breakdown
23	of the information sharing.
24	Q. It's a two-way street, then?
25	A. Potentially, yes.

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1	Q. Why do you want them educated, them
2	being social media platforms? Why do you want
3	them to be educated on tools and methods for the
4	propagation of foreign disinformation?
5	A. We want them to understand how
6	foreign propaganda and disinformation actors are
7	trying to exploit the platforms to disseminate
8	propaganda and disinformation.
9	Q. Why do you want them to understand
10	that?
11	A. We want them to understand it
12	because they are the ones who are the owners of
13	the platforms.
14	Q. Okay. So why do you want the
15	owners of the platforms to understand that?
16	A. Because it's part of the Global
17	Engagement Center's mission to increase overall
18	awareness of propaganda and disinformation by
19	malign actors.
20	Q. If they are aware of those foreign
21	malign tools and methods, are they more likely,
22	on your view, to take their own defensive
23	actions against them?
24	MR. KIRSCHNER: Objection,
25	speculative.

1	A. I I can't speculate about the
2	actions that the social media companies may or
3	may not take. We would not ask them to do
4	anything. Our the extent of our engagement
5	would be to share insights, but not to ask them
6	to do something.
7	Q. Has the GEC ever asked a social
8	media platform to do something with respect to
9	content, other than the 2018 threat you
10	described this morning?
11	MR. KIRSCHNER: Objection,
12	hypothetical, hypothetical, assumes facts not in
13	evidence.
14	A. Not that I'm aware of.
15	MR. SAUER: Can I have L?
16	You're going to be handed a
17	document we're I think we're going to call
18	Exhibit 9.
19	(Exhibit No. 9 was marked for
20	identification.)
21	BY MR. SAUER:
22	Q. Do you see this document?
23	A. I do.
24	Q. And this is a collection of e-mails
25	we received from the government I'm sorry

1	we received from the social media platform
2	LinkedIn, that include Samaruddin K. Stewart; do
3	you see that?
4	A. I do.
5	Q. Okay. Do you know do you know
6	whether Mr. Stewart was reaching out to social
7	media platforms to schedule meetings?
8	A. I believe he was.
9	Q. And was he scheduling meetings with
10	just LinkedIn or other meetings? I mean, sorry,
11	other social media platforms?
12	A. I believe it would be others, as
13	well.
14	Q. Do you know which others he did
15	this with?
16	A. No, I don't recall the the list.
17	Q. Do you know if he met with Twitter?
18	A. I I don't know, no.
19	Q. Do you know if he met with
20	Facebook?
21	A. I don't know his meeting schedule,
22	no.
23	Q. Okay. You don't know, same
24	question as to other social media platforms,
25	your answer is you don't know any of them?

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1	A. Not that I don't know them. I
2	simply I don't know what his meeting schedule
3	was, I wouldn't have kept track of his schedule.
4	Q. Were you generally aware that he
5	was setting up meetings with multiple social
6	media platforms?
7	A. Yes.
8	Q. Did he do that at your direction?
9	A. He did that as part of his job to
10	facilitate engagement.
11	Q. And was he on the TET?
12	A. I believe so, yes.
13	Q. And I believe turn back that
14	last exhibit was he basically the Silicon
15	Valley location that was talked about on your
16	website?
17	A. Yes, I believe so.
18	Q. On the second page of this
19	document, the one bearing Bates page 10342
20	high level, did you participate in any of the
21	meetings that Mr. Stewart set up with social
22	media platforms?
23	A. I believe, yeah, I participated in
24	meetings. I don't know if he was the one who
25	set them up. I don't know the full, like, all

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1	the mechanics.
2	Q. Okay. Do you know who participated
3	in his meetings, other than himself?
4	A. No.
5	Q. Okay. Looking at this, this second
6	page, the one at the top, February 5th, 2020, he
7	initially reached out to Paul Rockwell at
8	LinkedIn; correct? Do you see that in the
9	middle of the page?
10	A. Yes, I see that.
11	Q. Do you know who Paul Rockwell is?
12	A. No.
13	Q. Would it surprise you if he's the
14	vice president and head of trust and safety for
15	LinkedIn?
16	A. No. I don't know his position.
17	Q. Okay. Was I know you testified
18	earlier that your Twitter meeting in 2021 dealt
19	with their trust and safety team; correct?
20	A. Right.
21	Q. And then your analogous meetings
22	you had with Facebook and possibly Google, in
23	the same timeframe, were also are the trust and
24	safety teams or their equivalents at those other
25	entities; correct?

1 A. Yes.
2 Q. Was Mr. Stewart told to reach out
3 to the trust and safety team at LinkedIn?
4 A. I don't believe we instructed him
5 or I didn't instruct him on which individuals or
6 teams to contact.
7 Q. Okay. And he, in this e-mail in
8 February of 2020, reaches out to Paul Rockwell
9 and says he's a senior advisor for the GEC
10 working out of Silicon Valley; correct?
11 A. Yes, I see that.
12 Q. So that corroborates your
understanding that he's in the Silicon Valley
14 location, so to speak; correct?
15 A. Yes.
Q. And he says that he's in his
agency's got interest in countering
disinformation in foreign state and non-state
19 propaganda; right?
20 A. That's what the e-mail says.
Q. Yeah, what's non-state propaganda?
22 A. That would be a terrorist
23 organization, for example.
Q. Got you. Okay.
25 And he links in the GEC's website;

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1	correct?
2	A. Yes.
3	Q. He talks about, let's explore
4	shared interest and alignment of mutual goals
5	regarding the challenge; do you know what he's
6	talking about there?
7	MR. KIRSCHNER: I apologize, where
8	are you reading from?
9	MR. SAUER: Next paragraph down in
10	his e-mail, so it's the very last paragraph on
11	this page.
12	BY MR. SAUER:
13	Q. Your time permitting, I'd like to
14	schedule a meeting to discuss or a phone call
15	to discuss, to explore shared interests and
16	alignment of mutual goals regarding the
17	challenge; right?
18	A. Mm-hmm.
19	Q. What's he what are these shared
20	interests and alignment of mutual goals?
21	MR. KIRSCHNER: Objection,
22	speculative.
23	BY MR. SAUER:
24	Q. If you know.
25	A. Shared interests regarding

1	countering disinformation in foreign state and
2	non-state propaganda.
3	Q. And what are your mutual goals with
4	the social media companies on that front?
5	MR. KIRSCHNER: Again, objection,
6	speculative.
7	A. As I stated, sharing our
8	understanding of the tools, techniques, and
9	campaigns of these foreign propaganda and
10	disinformation actors.
11	Q. Is it a goal of the GEC that those
12	foreign disinformation not spread in the United
13	States on social media; is that a goal of the
14	GEC?
15	A. The GEC's goals are not related to
16	this space within the United States. The GEC is
17	looking at foreign propaganda and
18	disinformation.
19	Q. The GEC is not interested in the
20	propagation of disinformation in the United
21	States; correct?
22	A. The GEC is focused on the
23	campaigns, the actions, the tools and techniques
24	of foreign propaganda and disinformation actors,
25	like Russia and China.

1	Q. If you go to the top of this page,
2	there's some other LinkedIn people on this
3	e-mail, Patrick Corrigan; do you see that?
4	A. Yes.
5	Q. Do you know who he is?
6	A. No.
7	Q. Would it surprise you if he's the
8	vice president for legal and digital safety?
9	A. Okay.
10	Q. Yeah, and then Nicole Isaac, is she
11	a trust strategist at LinkedIn?
12	A. I don't know her her job title.
13	Q. But it seems like the people at
14	LinkedIn are all members of the trust and safety
15	team, would that be consistent with if I may
16	finish the question would that be consistent
17	with other meetings that you talked about, where
18	you were meeting with people on their trust and
19	safety teams from these entities?
20	MR. KIRSCHNER: Objection,
21	speculative, and then compound.
22	A. Yes.
23	Q. If you flip to the next page, page
24	343, there's a reference to him setting up a
25	face-to-face meeting in February or March?

1	A. Okay.
2	Q. Do you know if that meeting
3	occurred?
4	A. I don't.
5	Q. Was it was it his common
6	practice to have oral face-to-face meetings
7	instead of, you know, kind of written exchanges
8	with with the social media platforms?
9	MR. KIRSCHNER: Objection, calls
10	for speculation.
11	BY MR. SAUER:
12	Q. If you know.
13	A. I don't know how, exactly, he
14	conducted his engagement.
15	Q. Turning a couple pages back to page
16	345, Bates page 345, a woman called Diana Patel
17	agrees to the meeting with him on the LinkedIn
18	side; right?
19	MR. KIRSCHNER: Objection, lack of
20	foundation.
21	BY MR. SAUER:
22	Q. If you look there at the top level
23	e-mail on the chain, the top of the page: Hi
24	Sam
25	A. Okay.
20	A. Okay.
I	

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1	Q thanks for reaching out; do you
2	see that?
3	A. Yes, I do.
4	Q. And he was responded to by Diana
5	Patel; correct?
6	A. Yes.
7	Q. What her title, according to the
8	e-mail?
9	A. Head of threat prevention.
10	Q. And under that?
11	A. Trust and safety.
12	Q. So she was the head of threat
13	prevention for the trust and safety team at
14	LinkedIn?
15	MR. KIRSCHNER: Objection,
16	speculative.
17	A. Yes, according to the e-mail.
18	Q. Okay. Can you flip ahead to the
19	page marked 351?
20	A. Mm-hmm.
21	Q. And this is a follow-up e-mail in
22	March that Mr. Stewart sent to the LinkedIn
23	trust and safety team after he had the oral
24	meeting; correct?
25	He says: Hello, Diana, it was nice
I	

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1	meeting you and your colleagues recently, at the
2	beginning of the e-mail; correct?
3	MR. KIRSCHNER: Objection,
4	speculative, lack of foundation.
5	A. Yes.
6	Q. And he discussed about being happy
7	to continue the engagement with them; is that
8	right?
9	MR. KIRSCHNER: Again, objection,
10	speculative, lack of foundation.
11	A. Where does it say that?
12	Q. Second sentence of the second
13	paragraph, as mentioned, the GEC has begun
14	sharing information, when appropriate, with
15	companies in the technology industry, and I
16	would be happy to continue the engagement with
17	you; correct?
18	A. Yes.
19	Q. Lower down he gives some links and
20	he links to something called the disinfo-cloud.
21	What's the disinfo-cloud?
22	A. It was an information sharing
23	platform for on tools to counter propaganda
24	and disinformation.
25	Q. What sort of tools were discussed

1	on that, are these computer programs or, you
2	know, what kind of tools are we talking about,
3	hammers and chisels?
4	A. No, I believe they were sort of
5	computer analytic tools.
6	Q. What kind of tools?
7	A. I I wasn't an active user of the
8	platform, but as I understand it, they were sort
9	of analytical tools.
10	Q. Just help me, as someone who's not
11	super tech savvy, what is an analytical tool?
12	A. Sure.
13	Q. I just don't understand what it
14	means.
15	A. An analytical tool would help a
16	tool that could identify coordinated inauthentic
17	activity on a social media platform by a foreign
18	disinformation actor.
19	Q. So did you say it could coordinate
20	inauthentic activity?
21	A. No. No.
22	
23	Q. Okay.A. I said: A tool that could identify
23	-
25	coordinated inauthentic activity by a foreign
23	propaganda and disinformation actor, like China

1	or Russia.
2	Q. Yeah, what's coordinated
3	inauthentic activity, is that, like, bots?
4	A. Yeah, it's it's it's
5	fake activity that is being coordinated for a
6	purpose.
7	Q. And I think some of your materials
8	talk about how you they would create fake
9	accounts of people who don't exist and give
10	them, you know, real looking pictures; is that
11	another example of coordinated fake activity?
12	A. It could be, you'd need to look at
13	the specifics more.
14	Q. Okay. What what do the tools do
15	to to identify coordinated specific activity?
16	A. I'm not a software expert. I don't
17	know how they work internally.
18	Q. Who was posting on that website or
19	is it a website or what is it, exactly?
20	A. It's a website. It's a it's a
21	platform that, as I understand, you can log into
22	and see examples of tools.
23	Q. Okay. And who who can log into
24	it, is it open to the public or is it only for
25	social media platforms or how does it work?

1	A. I believe it was for US government
2	tool developers and I believe some researchers,
3	and it would be not anyone, but you would have
4	to, I think, send in a request and then be
5	approved for for for access.
6	Q. It was was it a a GEC
7	initiative?
8	A. I believe so, yes. Yes.
9	Q. And was it funded by GEC?
10	A. I believe so, yes.
11	Q. Do you know who participated in it,
12	who had access to the platform?
13	A. I don't have the full list of all
14	the participants.
15	Q. What kinds of participants? I
16	think you mentioned earlier there would be tech
17	platforms could do that?
18	MR. KIRSCHNER: Objection,
19	mischaracterizing testimony.
20	A. It was, I believe, tool developers,
21	government agencies, and I believe researchers.
22	I don't have the full full list.
23	Q. And it got discontinued; correct or
24	is it still up and running?
25	A. I I don't recall. I believe it

	_
1	was up and running when I left for for
2	training.
3	Q. Left for?
4	A. For training in National Defense
5	University.
6	Q. Okay. So you were being trained at
7	National Defense? I thought you were teaching,
8	but you were
9	A. No, no, no, I was in a master's
10	program there.
11	Q. Oh, congratulations.
12	Okay. Whose team ran the
13	disinfo-cloud or runs it, I guess, if we don't
14	know if it's still up and running.
15	A. The Technology Engagement Team.
16	Q. That's the TET?
17	A. Yes.
18	Q. Can you flip ahead to the last page
19	of the document, 406?
20	A. Mm-hmm.
21	Q. And there is a calendar invite here
22	between Mr. Stewart and a series of recipients
23	on the LinkedIn side; do you see that?
24	A. Yes.
25	Q. And the subject of the meeting is:

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1	LinkedIn and	GEC countering disinformation and
2	propaganda; c	correct?
3	Α.	Yes.
4	Q.	And it looks like the participants
5	in the Linked	lIn side are Patrick Corrigan;
6	correct?	
7	Α.	Yes.
8	Q.	And is he the VP of legal and
9	digital strat	cegy for LinkedIn?
10		MR. KIRSCHNER: Objection, lack of
11	foundation, s	speculative.
12	BY MR. SAUER:	
13	Q.	If you know.
14	Α.	I don't know his position.
15	Q.	And then Paul Rockwell, the vice
16	president of	trust and safety, is on there?
17		MR. KIRSCHNER: Objection, same,
18	speculative,	lack of foundation.
19	BY MR. SAUER:	
20	Q.	On the line below, if you know?
21	Α.	Yes, I see the name.
22	Q.	Ousman Jobe; do you know who that
23	is?	
24	Α.	No, I do not.
25	Q.	Nicole Tarasoff, directly below?

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1	A. What's the question?
2	Q. Oh, do you see her name there?
3	A. Yes.
4	Q. Do you know if she's the director
5	of content policy at LinkedIn?
6	A. I don't know her position.
7	Q. And then there's a bunch of people
8	with state e-mails on this; do you see them
9	there?
10	A. Yes.
11	Q. Without reading their names into
12	the record, do you know who they are?
13	A. I recognize one, two, three of the
14	names.
15	Q. What are their roles in in
16	within state or within GEC?
17	A. As of the date of this e-mail, I
18	was already in National Defense University, so I
19	don't know exactly what their roles were at that
20	time.
21	Q. What are what roles did you
22	understand them to have at some time?
23	A. I believe one was on the China
24	team.
25	Q. Which one is that, in terms of

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1	order? I see one
2	A. I believe it's the first name.
3	Q. Okay. I got you.
4	A. And one, I believe, was on the
5	Russia team.
6	Q. Uh-h8h, and which one is that in
7	the order?
8	A. It is the penultimate name.
9	Q. Okay. And do you recognize the
10	other ones?
11	A. I recognize the second name.
12	Q. What's the role of that person?
13	A. I don't recall the precise role.
14	Q. Okay. Do you know what this
15	meeting is about on July 29th, 2021?
16	A. No.
17	Q. Do you have any any reason to
18	think there would be a counter countering
19	disinformation meeting on July 29th of 2021?
20	MR. KIRSCHNER: Objection.
21	BY MR. SAUER:
22	Q. And any specific topic that might
23	have come up in that timeframe, anything like
24	that?
25	MR. KIRSCHNER: Objection,

1	speculative.
2	A. I was no longer involved in the
3	day-to-day operations of the Global Engagement
4	Center in on July 29th, 2021.
5	MR. SAUER: Can I have M?
6	And so we're handing you what's
7	been marked as Exhibit 10.
8	(Exhibit No. 10 was marked for
9	identification.)
10	BY MR. SAUER:
11	Q. Do you recognize these e-mails, at
12	all, e-mails between people at the State
13	Department and CISA regarding a program for
14	African CSIRTs?
15	A. And what do you mean by recognize?
16	Q. Well, have you seen them before?
17	A. I don't I don't believe so. I
18	don't think I was on these e-mails.
19	Q. What's a CSIRT?
20	A. I a CSIRT?
21	Q. Do you know what that stands for?
22	If you look at the very first page,
23	in the very first paragraph: We're looking
24	forward to having you speak at the workshop on
25	disinformation and misinformation

1	A. I'm
2	Q for African CSIRTs next Tuesday.
3	A. No. There are a lot of acronyms in
4	government. I don't actually recognize this one
5	off the top of my head.
6	Q. Computer security incident response
7	team, is that a is that what it stands for,
8	do you think?
9	MR. KIRSCHNER: Objection,
10	speculative.
11	BY MR. SAUER:
12	Q. If you know.
13	A. It sounds plausible.
14	Q. And then the other people, on the
15	state side, participating here, are they members
16	of the GEC, do you know? If you look at that
17	name at the very top, who's sending this e-mail,
18	kind of organizing the conference, is that a GEC
19	person?
20	MR. KIRSCHNER: Objection, assuming
21	evidence not in the record.
22	A. I I don't recognize the person
23	who it's from.
24	Q. How about down there in the down
25	there in the cc line, second line, far right, I

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1	see Samaruddin K. Stewart?
2	A. Yes.
3	Q. Yeah, at that time he was still a
4	GEC person; fair to say?
5	A. Yes. Yes.
6	Q. Is he gone now?
7	A. I believe so, yes.
8	Q. Okay. And then directly below him,
9	there's another state person; is that a person
10	associated with GEC?
11	A. I I don't know.
12	Q. Were you familiar with this or do
13	you recall this particular program?
14	A. I I don't recall this particular
15	program.
16	Q. And I guess that we've been talking
17	about in May of 2021, were you at GEC then or
18	were you at National Defense University?
19	A. I was still at GEC in May.
20	Q. Okay. Third page of this
21	A. Mm-hmm.
22	Q if you go to the bottom of the
23	page, it's the one marked 12/1/96; do you see
24	that?
25	A. Yes.

1 O. There's a personnel state there who
~
2 I think was the original sender on the first
<pre>3 page; is that a name I take it that's a name</pre>
4 you do not recognize?
5 A. No, I don't.
6 Q. So you do not know if she's
7 associated with GEC?
8 MR. KIRSCHNER: Objection, asked
9 and answered.
10 A. No.
11 Q. And
MR. KIRSCHNER: Clarify the record,
13 he's saying just because he said no on
14 that question is he does not know, not that
15 the the person is not I just thought for
16 all our purposes it was a little bit of
17 BY MR. SAUER:
18 Q. Do you know whether that person is
19 associated with the GEC?
20 A. I do not know whether that person
21 is associated with the GEC.
Q. Just looking at what she wrote
here, on May 10th: Hello all, one more set of
24 answers from participants, these in response to
25 the question: What topics do you hope the
as the question. That copies do you hope the

1	workshop will cover; correct?
2	A. Okay.
3	Q. And if you go down to the bottom
4	bullet point on this page, if you go to the top
5	one it's about how to combat mis- and
6	disinformation; correct?
7	A. Yes, that's WHAT it says.
8	Q. And how to mitigate it once viral;
9	correct?
10	A. Yes.
11	Q. Bottom bottom bullet point,
12	there, says: Slow response to incidences
13	escalated to service providers; right?
14	A. That's what it says.
15	Q. So that's an expression of concern
16	that the service providers aren't responding
17	when people are raising concerns about content
18	on their platforms?
19	MR. KIRSCHNER: Objection,
20	speculative.
21	BY MR. SAUER:
22	Q. Is that what it seems to say?
23	A. I don't see a reference to content.
24	Q. So what incidences might be
25	escalated to service providers that don't relate

1	to content on their platforms?
2	MR. KIRSCHNER: Objection,
3	hypothetical and speculative.
4	BY MR. SAUER:
5	Q. You may answer.
6	A. Slow connectivity, malfunctions on
7	the platform, any number of things. I don't see
8	any reference to specify what type of incidents,
9	here.
10	Q. Okay. Can you turn to the next
11	page?
12	There's a reference there at the
13	top bullet point to fact checking techniques and
14	how to identify disinformation and
15	misinformation; correct?
16	A. Yes.
17	Q. Does GEC work with any
18	fact-checking organizations?
19	A. Yes, I believe it does.
20	Q. What what does it do? What sort
21	of work does it do with fact-checking
22	organizations?
23	A. I believe the GEC has supported
24	fact-checking organizations outside of the
25	United States.

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1	Q. Has the GEC ever supported
2	fact-checking organizations inside the United
3	
	States?
4	A. I don't believe so.
5	Q. Has the GEC ever worked with
6	fact-checking organizations that are used as
7	fact-checkers by social media platforms, like
8	Twitter, Facebook, Google and so forth?
9	MR. KIRSCHNER: Objection, vague.
10	A. What do you mean by used by?
11	Q. Well, do the social media platforms
12	consult with the fact checkers on their own?
13	MR. KIRSCHNER: Objection,
14	speculative.
15	A. I don't know what the social media
16	companies do with fact-checkers.
17	Q. What fact-checkers do you work
18	with?
19	A. I believe the Pointer Institute is
20	the only one I recall. I don't recall the
21	the specific organizations.
22	Q. Where is that? Where is that
23	located?
24	A. I don't recall.
25	Q. Is that a foreign or domestic

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1	fact-checking organization?
2	A. I don't I don't recall. I don't
3	recall anything beyond the name.
4	Q. Okay. How do you remember that?
5	In what connection do you remember that name?
6	A. I remember it coming up in either a
7	meeting or a document. I don't remember the
8	specific context.
9	Q. Do you remember how GEC works with
10	them?
11	A. No, I don't remember the specifics.
12	Q. Do you have any understanding of
13	how GEC works with fact-checking organizations,
14	in general?
15	A. I believe it would be identifying
16	an organization that works in a location where a
17	foreign propaganda disinformation actor, like
18	Russia or China, would be active and supporting
19	them in some fashion.
20	Q. What kind of fashion?
21	A. Support could range from a grant or
22	a financial support to information sharing or
23	training in tools and techniques.
24	Q. Okay. So information sharing,
25	would that be identifying narratives and things

1	like that, that they should be aware of?
2	A. I I don't know what the
3	specific, you know, information sharing would
4	be.
5	Q. So you don't know what kind of
6	information would be shared between GEC and
7	international fact-checking organizations or any
8	fact-checking organization; fair to say?
9	A. No. I wasn't involved in the
10	direct back and forth, so I can't speak to
11	the to the specifics.
12	Q. Who was involved on GEC's side, by
13	title?
14	A. I don't know.
15	Q. Do you know what team would have
16	engaged engages with fact-checking
17	organizations?
18	A. It would have been one of the three
19	nation-state focus teams, so probably the
20	Russian, China, or Iran team.
21	Q. Next bullet point down, second one
22	on the page: Proven techniques to take down
23	these articles. Does that, in the effectiveness
24	of fake news checkers, right, so the topics
25	being raised by this State Department person for

1	discussion from, I take it, the CSIRT
2	participants about how to take down these
3	articles relating to misinformation and
4	disinformation; correct?
5	MR. KIRSCHNER: Objection,
6	mischaracterizes. Well, lack of foundation and
7	assumes evidence not in the record and
8	mischaracterizes document.
9	BY MR. SAUER:
10	Q. Is that what it says?
11	A. Yes, that's what it says.
12	Q. Okay. And does GEC you talk a
13	lot about tools and techniques, does GEC have
14	information about how to take down techniques
15	to take down these articles?
16	A. No, not generally, the GEC doesn't
17	flag and take things down.
18	Q. Do you know what this state
19	official is referring to when she talks about
20	proven techniques to take down these articles?
21	A. No.
22	MR. KIRSCHNER: Objection,
23	speculative.
24	A. No, I don't I don't see the
25	context.

1	Q. Okay. Lower on down there,
2	international takedown requests, three bullet
3	points down; correct?
4	A. Yes, I see that.
5	Q. Do you know what that refers to?
6	A. I don't see the additional any
7	additional context here.
8	Q. So you don't know what are
9	you are you aware of there being
10	international international takedown requests
11	presented to social media platforms?
12	A. I'm aware that international
13	governments would sometimes reach out with
14	requests. I know that it's an issue. It's not
15	one that generally involve the GEC.
16	Q. What are what are international
17	governments?
18	A. Government of any other country.
19	Q. Okay. So a government of a foreign
20	country?
21	A. A foreign government might reach
22	out to a social media company.
23	Q. And ask them to take something
24	down?
25	A. Yes.

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1	Q. But you're saying GEC doesn't do
2	that?
3	A. No. No. That's what I believe
4	this refers to, international takedown requests.
5	So a request from a foreign government to a
6	social media company to to remove something.
7	MR. SAUER: Can you give me N?
8	I think this is going to be Exhibit
9	11 that you're being handed.
10	(Exhibit No. 11 was marked for
11	identification.)
12	BY MR. SAUER:
13	Q. Do you have Exhibit 11 in front of
14	you?
15	A. I do.
16	Q. And this is an e-mail chain or
17	actually it's against multiple e-mail chains,
18	involving CISA and the GEC, from 2020; correct?
19	A. Yes.
20	Q. Okay. The bottom of the first
21	page, you see there's an e-mail from a state
22	official called Alex Dempsey; do you see that?
23	A. I do.
24	Q. Who's Alex Dempsey?
25	A. I believe he's on the I2C2 team, so

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1 th	ne interagency coordination cell.
2	Q. So he's a GEC official? Sorry
3	A. Yes, yes, I believe he's a member
4 01	f the GEC.
5	Q. And if you flip to the second page,
6 i t	t looks like he has flagged a, quote, disinfo
7 c a	ampaign on YouTube targeting a DS officer;
8 w l	hat's a DS officer, do you know?
9	A. I believe it would be diplomatic
10 se	ecurity.
11	Q. What's a diplomatic security
12 o t	fficer?
13	A. A member of the Diplomatic Security
14 Oi	ffice of the State Department.
15	Q. So would that be somebody working
16 in	n an embassy abroad or here in Washington,
17 D	.C.?
18	A. It could be either.
19	Q. But it's a state employee of some
20 k :	ind?
21	A. Yes.
22	Q. And is involved says: Claiming
23 sl	he brought COVID-19 to something in an athletic
24 co	ompetition; right?
25	A. Right.

1	Q. Yeah, and without mentioning this
2	person's name, he identifies, who, what, when,
3	where, and why; right?
4	MR. KIRSCHNER: Objection, vague,
5	assuming evidence not in the record.
6	BY MR. SAUER:
7	Q. Well, I'm just reading, who, what,
8	when, where and why, from Mr. Dempsey's e-mail;
9	do you see that?
10	A. Yes, I do.
11	MR. KIRSCHNER: I don't see the
12	why.
13	A. I see, who, what, when, where and
14	why, yes.
15	Q. Okay. And then the where is
16	online, and he links a YouTube video?
17	A. Yes.
18	Q. And what is a targeted
19	disinformation campaign against a state
20	official; correct?
21	A. Yes.
22	Q. And then, down there in the why, it
23	talks about there's a false narrative being
24	pushed online about this person, and there's a
25	YouTube channel run by Americans falsely

1	claiming that she is, quote, patient zero, and
2	that as a US army reservist she brought COVID-19
3	to Wuhan during an athletic competition;
4	correct?
5	A. Yes.
6	Q. Is there a theory out there that
7	COVID-19 originated or spread at an
8	international athletic competition in Wuhan
9	during the fall of 2019?
10	A. Apparently, according to the to
11	the to the information here.
12	Q. Okay. And so Mr. Dempsey, of the
13	GEC, forwarded this to CISA; right? Do you know
14	who Robert Schaul is?
15	A. No.
16	Q. He's called Rob.
17	A. No.
18	Q. Do you know who Brian Scully is?
19	A. I believe Brian Scully was either
20	at or was the head of the disinformation office
21	at CISA.
22	Q. That's what we've described earlier
23	as the mis-dis- and mal information team?
24	A. Right. The it was initially, I
25	think, a task force, and it was subsequently

1	renamed as the mis-dis- and mal information
2	team.
3	Q. And Brian Scully here, about a
4	third of the way down the first page, has a
5	CISA.DHS.gov e-mail address; correct?
6	A. Yes, correct.
7	Q. So Alex Dempsey's e-mail is taken
8	by Brian Scully, at CISA, and forwarded to two
9	Facebook officials; correct?
10	A. Yes.
11	Q. They have FB.com e-mails there?
12	A. Yes.
13	Q. And Scully says to these two
14	officials: Please see the below reporting from
15	our State Department GEC colleagues, Global
16	Engagement Center colleagues, that's your unit;
17	right?
18	A. Yes, that's the Global Engagement
19	Center.
20	Q. Okay. About a disinformation on
21	YouTube targeting a diplomatic security officer;
22	correct?
23	A. Yes.
24	Q. And then one of the Facebook
25	officials responds, and says: Thank you so much

1	for this. Have flagged for our internal teams;
2	correct?
3	A. Yes.
4	Q. And so this was a a report from
5	the GEC to CISA about a disinformation campaign
6	run by Americans; correct?
7	MR. KIRSCHNER: Objection, lack of
8	foundation, speculative.
9	BY MR. SAUER:
10	Q. According to the according to
11	the bold paragraph Y on the second page?
12	MR. KIRSCHNER: Again, objection,
13	lack of foundation.
14	A. It says here that the channel is
15	run by Americans. I don't know about the
16	campaign.
17	Q. So it's the content that he's
18	complaining about is on a channel, a YouTube
19	channel, run by Americans; correct?
20	A. That's what the e-mail says, yes.
21	Q. And this gets sent to CISA, who
22	forwards it onto Facebook, who says: We have
23	flagged this for our internal teams; correct?
24	MR. KIRSCHNER: Objection,
25	speculative, lack of foundation.

1	BY MR. SAUER:
2	Q. Is that what the e-mail says?
3	A. The e-mail went from the Global
4	Engagement Center to CISA to Facebook.
5	Q. Okay. And CISA described itself on
6	its website as, quote, routing disinformation
7	concerns to social media platforms?
8	MR. KIRSCHNER: Objection,
9	speculative.
10	A. I don't know how they describe
11	themselves on their website.
12	Q. Were you aware of this incident
13	when it happened?
14	A. I don't I believe I was aware of
15	the YouTube video. I don't know that I was
16	aware or on the e-mails here. I I do recall
17	the disinformation involving a diplomatic
18	security officer. I do recall that.
19	Q. And this incident in 2020 is
20	different than the 2018 incident you described
21	this morning, where you discussed there was a
22	threat to the life of someone abroad; right?
23	A. They are separate incidents.
24	Q. Yeah, this is two years later, it's
25	a completely different incident.

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1	A. Completely different.
2	Q. Were you aware what was your
3	knowledge of this incident when it happened?
4	Did they ask you for authority to flag this for
5	CISA or did you hear about it afterwards? What
6	was your knowledge at the time?
7	A. I believe I was aware that there
8	was a disinformation campaign involving a
9	diplomatic security officer. I don't see myself
10	on these e-mails, and I don't recall whether I
11	was in the internal discussion that led to this
12	chain.
13	Q. Did you authorize anyone to raise
14	this with CISA so that they could flag it for a
15	social media platforms?
16	A. I don't I don't recall that.
17	Q. Do you know one way or the other
18	whether you did that?
19	A. I I I don't recall.
20	Q. If you flip ahead through this
	e-mail chain
22	A. Mm-hmm.
23	Q see the next page, 7671.
24	
	A. Okay. Mm-hmm.
25	Q. Scully, at CISA, takes the same

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1
1 e-mail chain and forwards it onto Twitter, as
<pre>2 well; correct?</pre>
3 MR. KIRSCHNER: Objection, lack of
4 foundation.
5 A. I I see that here.
Q. Yeah, and and Twitter just
7 responds: Thank you, Brian; correct?
8 A. Yes.
9 Q. Then flip ahead to page 7675.
10 A. Okay.
Q. This is the Alex Dempsey e-mail
raising this, who what. When, where, and why,
is forwarded by Scully onto Google, as well;
14 right?
MR. KIRSCHNER: Again, objection,
16 lack of foundation.
17 BY MR. SAUER:
18 Q. The top of the page, without
mentioning the name, it's Brian Scully is
forwarding this Alex Dempsey e-mail to a third
social media platform, someone with a Google.com
22 e-mail address; correct?
23 A. Yes.
Q. And that cover page, it says:
25 Please see below, reporting from colleagues at

1 the State Department, Global Engagement Center,
2 about disinformation on YouTube regarding a
<pre>3 diplomatic security officer; correct?</pre>
4 A. Yes.
5 Q. And then it goes on to say: It
6 does appear the FBI has been notified
7 notified, so you may also have heard from them;
8 correct?
9 A. Yes.
10 Q. Was this incident did the GEC
11 notify the FBI of this incident?
12 MR. KIRSCHNER: Object. Go on.
13 A. I don't know.
Q. Do you remember that, at all?
15 A. I I don't recall.
Q. You don't remember any discussions
17 with the FBI? I know you say you remember this
18 incident, at some level. Do you remember any
19 interaction with the FBI relating to it?
20 A. I remember the incident. I don't
21 recall which interagency entities were
22 contacted.
Q. Okay. Some were, though, obviously
24 CISA?
25 MR. KIRSCHNER: Objection,

1	mischaracterizing testimony.
2	BY MR. SAUER:
3	Q. Yes or no?
4	A. I'm seeing these e-mails, but I
5	wasn't on these e-mails.
6	Q. And you don't remember them?
7	A. I wasn't on these e-mails.
8	Q. Do you did you authorize the
9	sending of e-mails like this, with respect to
10	this incident?
11	A. I don't
12	MR. KIRSCHNER: Object. I was
13	going to say, objection, asked and answered.
14	BY MR. SAUER:
15	Q. If you know.
16	A. I don't recall.
17	Q. Looking down here at the bottom of
18	this page, it's another copy of the same Alex
19	Dempsey e-mail to Rob Schaul. I can't remember
20	if you said, do you know who Rob Schaul is?
21	A. No, I do not.
22	Q. And he says: Rob, our leadership
23	has asked that we share the below information
24	with our IA counterparts; right?
25	A. Yes.

1	Q. What's who's our leadership, do
2	you know?
3	A. Under the why, I see listed:
4	Special envoy, Lea Gabrielle, who would have
5	been the highest ranking official in the office
6	at that time. So if she authorized it my
7	authorization wouldn't be necessary.
8	Q. Okay. Do you know if Lea
9	Gabrielle I think you testified about her
10	earlier you would have been reporting
11	directly to her, at this time; right?
12	A. Yes.
13	Q. So we're talking about March 25th,
14	2020, she was the acting coordinator?
15	A. She was the appointed coordinator.
16	She was not acting, she was the coordinator.
17	Q. And you were principal deputy
18	coordinator at the time?
19	A. Yes.
20	Q. And as you say, it looks like Lea
21	Gabrielle in other words, you interpreted
22	let me ask you this, and I don't know what you
23	interpret what do you remember? Do you
24	remember Lea Gabrielle authorizing people to
25	flag this for CISA and the FBI?

1	A. I do not know.
2	Q. And you don't know who,
3	specifically, our leadership is, do you?
4	A. I don't know what "our leadership"
5	refers to here. Down under the why it refers to
6	special envoy, Lea Gabrielle.
7	Q. Here in the first sentence, could
8	that be you or you don't remember?
9	A. It could be, it doesn't specify
10	what "our leadership" means.
11	Q. And you don't remember whether you
12	made any authorization about this?
13	A. I don't.
14	Q. And that later made sense, it talks
15	about share them with our IA counterparts; do
16	you know what IA stands for?
17	A. Interagency.
18	Q. Okay. Are you aware of any other
19	situations where anyone at the GEC flagged
20	content on a YouTube channel run by Americans to
21	CISA or a social media platform or the FBI as a
22	disinformation campaign to be combatted?
23	A. No, I'm not.
24	Q. This is the only incident that you
25	can recall at this time?

1	MR. KIRSCHNER: Objection,
2	mischaracterizing testimony.
3	A. I'm seeing this in these e-mails,
4	but I wasn't on these e-mails. I recall the
5	the video and the campaign. I don't recall
6	the the interagency communications here.
7	Q. That whole campaign about the virus
8	being spread at an international athletic
9	competition in Wuhan, was that one of the
10	China-related false narratives you talked about
11	earlier?
12	A. I believe it was a minor, like, a
13	sub-narrative, because it involved, like, an
14	athletic competition. But it wasn't one of the
15	major narratives.
16	Q. How about as was it a Russian
17	narrative?
18	A. I don't recall it as a Russian
19	narrative.
20	Q. You don't recall it as a major
21	Chinese narrative or a Russian narrative?
22	MR. KIRSCHNER: Objection,
23	mischaracterizes testimony.
24	A. I don't recall it as this. I
25	recall it as a minor narrative.

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-1	
1	Q. Have you ever heard of the Election
2	Integrity Partnership?
3	A. Yes.
4	Q. What is that?
5	A. I I don't recall the exact
6	specifics of of what it was.
7	Q. What have you heard about it?
8	A. I read the section in the
9	complaint.
10	Q. Independent of the complaint, do
11	you have any knowledge of the Election Integrity
12	Partnership?
13	A. Independent of the complaint, I
14	recall that it was an entity that someone at the
15	GEC was in contact with, that's that's
16	that's the extent.
17	Q. Who was who at the GEC was in
18	contact with it?
19	A. I believe I believe it was I
20	believe it was a member of the Russia team.
21	I I think it may have been George Beebe on
22	the Russia George Beebe on the Russia team.
23	Q. How do you spell Beebe?
24	A. B-e-e-b-e.
25	Q. B-e-e-b-e, first name George?

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1	
1	A. George.
2	Q. G-e-o-r-g-e?
3	A. Right.
4	Q. What makes you think it was him?
5	A. I seem to remember he was the
6	individual who who who was engaged with
7	the what did you call it, the Election
8	Integrity Partnership, right?
9	Q. Yes.
10	A. Okay.
11	Q. I'll call it the EIP from now on.
12	A. Okay.
13	Q. You remember that he was engaged in
14	that, how did you know that? How did you know
15	he was engaged in that?
16	A. I think it was sort of reported at
17	a meeting. I don't recall the exact context.
18	Q. Do you know who authorized him to
19	be involved in it?
20	A. No, I don't know who who who
21	authorized it.
22	Q. Do you know what the nature of his
23	involvement was, like, what did he do with
24	respect to the EIP?
25	A. No. I know he had some
1	

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1	communication with him. I don't know the
2	specifics of his involvement.
3	Q. Okay. Do you know what the EIP
4	was?
5	A. Only broadly, that it was a
6	partnership to counter, I think, our our
7	our involvement would have been foreign
8	propaganda and disinformation focused on the
9	election or elections. I don't recall.
10	Q. Do you know what Mr. Beebe or
11	whoever it was I take it you think it was
12	Mr. Beebe, but you're not sure?
13	A. I think it was him, but I'm not
14	sure.
15	Q. Okay. Whoever it was involved,
16	your understanding is they would be involved in
17	flagging foreign disinformation relating to the
18	election?
19	MR. KIRSCHNER: Objection, assuming
20	evidence not in the record, mischaracterizes
21	testimony.
22	A. I I I don't recall the exact
23	nature of their involvement.
24	Q. Okay. So you earlier, when you
25	said: Our involvement would have been

r	
1	A. Right.
2	Q flagging foreign disinformation
3	or raising foreign disinformation concerns,
4	what's your basis for that?
5	A. I said: Our involvement would have
6	been related to foreign propaganda.
7	Q. Okay.
8	A. And the basis for that is the GEC's
9	mandate.
10	Q. In other words, that's what the GEC
11	does, generally, but you don't have any specific
12	knowledge with respect to what Mr. Beebe did?
13	A. No, I don't recall anything
14	specific about what he did.
15	Q. Do you know who authorized the GEC
16	to be involved in the EIP, at all?
17	MR. KIRSCHNER: Objection, assumes
18	evidence not in the record.
19	A. I don't.
20	Q. Did someone authorize it or did
21	Mr. Beebe just kind of do it on his own?
22	A. I don't recall who who
23	authorized it.
24	Q. Yeah, okay.
25	MR. SAUER: Can I have P?

1	This is going to be, I think,
2	Exhibit 12. Is that right, 12?
3	(Exhibit 12 was marked for
4	identification.)
5	MR. KIRSCHNER: Mr. Sauer, just
6	the water's now starting to drip towards the
7	table. Do you want to take a two-minute break
8	to wipe off the
9	MR. SAUER: That didn't work very
10	well.
11	MR. KIRSCHNER: We can get a
12	napkin. I won't put this one in my manilla
13	folder.
14	MR. SAUER: You should have rubber
15	bands.
16	MR. KIRSCHNER: We're going to ask
17	the witness to read the entire document, and
18	that will be the seven hours.
19	I'm joking, but I do want to allow
20	the witness, when you have something when you
21	have something that you're asking, specifically,
22	to have allow the witness to have sufficient
23	time to understand the context.
24	MR. SAUER: That's okay, only a few
25	pages that are

1	MR. KIRSCHNER: Okay.
2	BY MR. SAUER:
3	Q. Have you seen this report before?
4	A. I believe I've seen the cover of
5	it.
6	Q. Okay. In what connection did you
7	see the cover of it?
8	A. It may have been a news thing. I
9	don't recall the exact context.
10	Q. Was it in context of a GEC meeting
11	or was it just, you know, seeing it somewhere
12	else?
13	A. It could have been both.
14	Q. Okay. You just don't remember?
15	A. I don't. I think I did see media
16	coverage, and it may also have come up at a GEC
17	meeting.
18	Q. And is this the report that the EIP
19	did about its activities in 2020, with respect
20	to disinformation on social media?
21	A. Yes, that's what it appears to be.
22	Q. It's quite a lengthy report, about
23	292 pages; fair to say?
24	A. Yes.
25	Q. Before today, have you read any of

1	this?
2	A. I had glanced at the I think the
3	executive summary.
4	Q. When did you do that?
5	A. I don't recall. I think it may
6	have been when it came out, but I don't recall
7	exactly.
8	Q. And when it came out, I think, is
9	that identified on the second page or this only
10	says 2021, third page, I think it says it came
11	out in June 15th, 2021?
12	A. June 15th, 2021.
13	Q. Do you think you looked at it at
14	that time?
15	A. Or maybe after that, that was
16	almost exactly when I was leaving the Global
17	Engagement Center.
18	Q. Did you look at it more recently,
19	like, for example, before your testimony today?
20	A. I think I looked at the the
21	the like the front, the cover.
22	Q. The cover?
23	A. Yeah.
24	Q. You may have
25	A. I did not read the whole report. I

1	did not read the whole report.
2	Q. Well, let me let me kind of walk
3	you through some questions, and obviously if you
4	haven't read it before, you know, if you don't
5	know the answer, if you don't know, let me know.
6	But just can you go to page V,
7	the first page of the executive summary, little
8	Roman five.
9	A. Okay.
10	Q. There's a in the bottom
11	paragraph there, there's a statement that the
12	EIP this is the EIP talking about its own
13	activities, quote, bridge the gap between
14	government and civil society, end quote, help to
15	strengthen platform standards for combatting an
16	election-related misinformation.
17	Do you know do you have any
18	knowledge of helping strengthen platform
19	standards for combatting disinformation?
20	MR. KIRSCHNER: Objection, vague.
21	BY MR. SAUER:
22	Q. Do you know what they're talking
23	about there?
24	A. No. I'm not going to I I
25	I can't interpret beyond the words here. I

1	don't know.
2	Q. Okay. Higher up in the page, it
3	says: Dozens of federal agencies support this
4	effort, including CISA. Do you know if CISA's
5	involved in the EIP?
6	MR. KIRSCHNER: Objection,
7	speculative.
8	BY MR. SAUER:
9	Q. If you know.
10	A. I don't know any of the specifics
11	of CISA's involvement with the EIP.
12	Q. Next page, page little Roman six,
13	at the very top, it talks about how the EIP was
14	formed to enable realtime information exchange
15	between election officials, government agencies,
16	and others, including social media platforms;
17	correct?
18	A. That's what it says, yes.
19	Q. Do you know of any other
20	arrangements for realtime information exchange
21	between government agencies and social media
22	platforms?
23	A. What what could you could
24	you be more specific?
25	Q. Well, can you think of anything

1	that you would describe as a realtime
2	information exchange between government
3	officials and social media platforms, any
4	arrangement?
5	A. Well, what do you mean by realtime?
6	Q. Well, stuff that's anything that
7	raises concerns as they're occurring on social
8	media?
9	A. I'm not aware of any standing
10	arrangement like that at the GEC. I can't speak
11	to other parts of government.
12	Q. At the bottom of this page, there's
13	bullet points, you see there's four bullet
14	points there, and the last one is:
15	Delegitimization of election results; do you see
16	that?
17	A. Yes.
18	Q. It talks about content aiming to
19	delegitimize election results on the basis of
20	false or misleading claims; right?
21	A. Yes.
22	Q. Are you aware of Mr. Beebe raising
23	concerns about delegitimization of election
24	results?
25	A. No, I don't no, I'm not aware.

1	
1	Q. Or anyone else at GEC raising those
2	kinds of concerns to the EIP?
3	MR. KIRSCHNER: Objection, lack of
4	foundation.
5	A. No, I'm not aware of any of the
6	specifics of interactions between GEC members
7	and the EIP.
8	Q. Next paragraph down, last line of
9	the page, it says: Of the tickets we, the EIP,
10	processed 72 percent were related to
11	delegitimization of the election; correct?
12	A. That's what it says.
13	Q. So it sounds like it was processing
14	complaints that had to do with attacking the
15	legitimacy of the 2020 election?
16	MR. KIRSCHNER: Objection, lack of
17	foundation.
18	A. That's what it says here, yes.
19	MR. KIRSCHNER: John, we've been
20	Mr. Sauer, we've been going over an hour, so we
21	should take a break sometime soon.
22	MR. SAUER: That's fine with me.
23	THE WITNESS: Yeah, let's take a
24	MR. SAUER: That's fine. If the
25	witness wants a break, we can do it.

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1	Can we keep it at five minutes or
2	so?
3	MR. KIRSCHNER: Yeah.
4	MR. SAUER: Let's keep moving
5	forward.
6	THE VIDEOGRAPHER: The time is 2:31
7	p.m. We are off the record.
8	(Recess.)
9	THE VIDEOGRAPHER: The time is 2:40
10	p.m. We're back on the record. Please proceed.
11	BY MR. SAUER:
12	Q. Still in Exhibit 12, can you flip
13	ahead to page XI little Roman 11.
14	A. Okay.
15	Q. Do you see there's a note there
16	that lists about 15 social media platforms?
17	A. Yes.
18	Q. Eyeballing that list, are you aware
19	of anyone from the GEC interacting with anyone
20	from any of those social media platforms in
21	connection with the EIP?
22	MR. KIRSCHNER: Objection, lack of
23	foundation, speculative.
24	A. I'm not aware of any specific GEC
25	interactions related both to the EIP and the

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1	platforms listed here.
2	Q. Okay. So you anticipate my next
3	question is: You don't know of anyone at GEC
4	reaching out to EIP in connection with any of
5	these platforms; fair to say?
6	A. I I don't have any information
7	about anyone at the GEC reaching out to these
8	platforms in connection with the EIP.
9	Q. Do you have any specific
10	information about GEC's involvement in the EIP?
11	A. Not that I recall. I recall a
12	general engagement with the EIP. I don't recall
13	the specifics of it.
14	Q. Do you recall anything other than
15	the fact that there was a general engagement
16	with the EIP?
17	A. No. I recall the GEC was engaging
18	with the partnership, but I don't I don't
19	recall any specifics.
20	Q. And do you know I know you
21	mentioned Mr. Beebe?
22	A. Right.
23	Q. Do you know if there was more than
24	one person or whether it was just one person?
25	A. I remember his name in connection

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1	with it, and we also had an individual who
2	who liaised on election-related issues, but I
3	don't recall whether she engaged with the EIP.
4	Q. Who what was her name?
5	A. Her name was Adele Ruppe.
6	Q. And is she still there at the GEC?
7	A. No.
8	Q. Why did she why did she engage
9	on election issues? You said she engaged on
10	election issues, tell us what that involves?
11	A. She would attend interagency
12	meetings on safeguarding the security of the
13	elections.
14	Q. Okay. And what agencies did she
15	meet with?
16	A. I I don't recall, it would be
17	probably the full range of national security
18	agencies.
19	Q. And you say she attended
20	interagency meetings on safeguarding the
21	security of elections. Were those American
22	elections, specifically?
23	A. Yes, I believe so.
24	Q. So we're not talking about
25	elections in foreign countries. She was on

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1	meetings that discussed safeguarding the
2	security of American elections; is that right?
3	A. Yes, I believe so.
4	Q. And and you think she may have
5	had some connection or involvement with the EIP?
6	MR. KIRSCHNER: Objection,
7	mischaracterizes testimony.
8	A. I I simply don't know.
9	Q. You don't know? How did and
10	maybe I'm just forgetting. How did why did
11	you bring up her name just now, because you
12	thought she might have had that interaction?
13	A. Because she was the other she
14	was the GEC person who held the portfolio on
15	election security-related issues.
16	Q. Okay. What else was involved in
17	that portfolio, the election security portfolio
18	for GEC, other than going to interagency
19	meetings with other federal agencies?
20	A. I believe it was almost entirely
21	focused on interagency meetings.
22	Q. Do you know if she raised concerns
23	about election security in those meetings or did
24	she merely listen?
25	MR. KIRSCHNER: Objection,

1	speculative.
2	BY MR. SAUER:
3	Q. If you know.
4	A. I don't know the exact nature of
5	her interactions in those meetings.
6	Q. What other activities, if any, does
7	the GEC conduct with respect to election
8	security?
9	MR. KIRSCHNER: Objection, vague,
10	ambiguous.
11	A. The GEC, as I recall, was primarily
12	in listening mode, on occasion it might discuss,
13	you know, general Russian or Chinese or other,
14	you know, foreign disinformation actors. And as
15	I've noted, the narratives are the tools and
16	techniques that they use.
17	Q. And would those be narratives,
18	tools and techniques that relate to kind of
19	destabilizing or disrupting American domestic
20	elections?
21	MR. KIRSCHNER: Objection.
22	BY MR. SAUER:
23	Q. If you know.
24	A. I don't recall any specific
25	narratives.

1	Q. Okay. And you don't know whether
2	that individual with the election security
3	portfolio for GEC had any direct involvement
4	with the EIP?
5	A. I don't, no.
6	Q. But you think that she may have
7	because of the nature just because of the
8	nature of her portfolio, this was
9	election-related, she was the election person,
10	therefore, she may have been involved in this?
11	A. Yes, that's possible.
12	Q. Next page, XII little Roman 12.
13	A. Mm-hmm.
14	Q. List of contributors at the very
15	bottom, it says that the EIP would like to thank
16	Matthew Masterson; do you know who he is?
17	A. No, I don't.
18	Q. Have you ever heard that name
19	before, to your recollection?
20	A. I don't know. Is he listed in the
21	complaint? I don't I don't I don't really
22	know.
23	Q. Okay. I was just curious if you
24	know.
25	A. No. No idea.

1	Q. Okay. Next page, XIII, little
2	Roman 13. There's acknowledgments which are
3	basically thanking the people who funded the
4	EIP.
5	A. Mm-hmm.
6	Q. Do you know who funded the EIP?
7	A. No, I don't.
8	Q. Okay. And there's four four
9	entities involved in it; were you aware of that,
10	that are listed here?
11	MR. KIRSCHNER: Can you point us to
12	where you're referring to?
13	BY MR. SAUER:
14	Q. Digital Research Forensic Lab of
15	the Atlantic Council, in bold, Graphika, in
16	bold, Stanford Internet Observatory, in bold,
17	and university of Washington Center For an
18	Informed Public, in bold; do you see those four
19	entities?
20	MR. KIRSCHNER: All right.
21	A. Yes.
22	Q. Were you aware that they were
23	involved in the EIP?
24	A. I'm only seeing this here, I
25	don't I don't recall who was involved in the

1
1 EIP.
Q. Okay. Well, then, down at the
3 bottom of the page, last sentence, third line
4 from the bottom, researchers who contributed to
5 the EIP also received partial support from the
6 US National Science Foundation; correct?
7 A. I I see that in here.
8 Q. So that's government funding, at
9 least in part, for the EIP; correct?
10 MR. KIRSCHNER: Objection, lack of
11 foundation.
12 BY MR. SAUER:
Q. Is that what it says?
14 MR. KIRSCHNER: Speculation.
15 A. I see what it that's what it
16 says here, yes.
Q. Were you aware of are you aware
of government funding for the EIP from any other
19 source?
20 A. No.
Q. Are you aware of government funding
for the EIP from any State Department source?
23 A. No.
24 Q. Are you aware of government funding
or support for the EIP from anyone at CISA?

	_
1	A. No.
2	Q. Generally speaking, you you
3	don't know who funded it, essentially; is that
4	fair to say?
5	A. Yes, I don't know.
6	Q. Were there ever any discussions at
7	State about funding it or supporting it, that
8	you recall?
9	A. I don't recall any discussions
10	about funding or supporting it.
11	Q. If you flip ahead a few pages, to
12	Arabic page 2, do you see at the beginning of
13	the second full paragraph, where it says: The
14	initial idea?
15	A. Mm-hmm.
16	Q. The initial idea for the
17	partnership, that's the EIP, came from four
18	students that the Stanford Internet Observatory
19	funded to complete volunteer internships at CISA
20	at the Department of Homeland Security; correct?
21	MR. KIRSCHNER: Objection, lack of
22	foundation.
23	BY MR. SAUER:
24	Q. Is that what it says?
25	A. I see that, yes, that's what it

		<u>_</u>
1	says.	
2	Q.	Okay. And then, were you aware of
3	CISA interns	originating the idea for this EIP?
4	Α.	No, I was not.
5	Q.	Were you did anyone at the State
6	Department co	ntribute to the origination of
7	of EIP?	
8		MR. KIRSCHNER: Objection, lack of
9	foundation.	
10	Α.	I'm not aware of any State
11	Department in	volvement.
12	Q.	So it appears that it was partly
13	funded by the	government, and that it was the
14	idea was orig	inated by government workers at the
15	time; correct	?
16		MR. KIRSCHNER: Objection, lack of
17	foundation.	
18	BY MR. SAUER:	
19	Q.	Is that what it says?
20	Α.	I
21		MR. KIRSCHNER: Objection,
22	mischaracteri	zing testimony.
23	А.	I I see what it says here.
24	Q.	Yeah. Go down further in that
25	paragraph, an	d specifically that's what it says;

1	right? It says that it was originated by people
2	who were working for CISA at the time; correct?
3	MR. KIRSCHNER: Objection, asked
4	and answered, mischaracterizing the evidence.
5	BY MR. SAUER:
6	Q. Is that what it says?
7	A. It says that: Stanford funded the
8	students to complete internships, not that CISA
9	funded them. It says the Stanford Internet
10	Observatory funded to complete.
11	Q. Right, the internships were funded.
12	A. By Stanford.
13	Q. Right. And they were volunteer
14	internships at CISA. So CISA interns who were
15	funded by Stanford
16	A. Right.
17	Q originated the idea for the EIP?
18	I'm just asking if that's what it says.
19	A. Yes, that is what it says here,
20	yes.
21	Q. Okay. Lower down on in the same
22	paragraph: This is especially true; do you see
23	that sentence? Actually, immediately before
24	that, it says: No government agency in the
25	United States has the explicit mandate to

1	monitor and correct mis and disinformation;
2	correct?
3	A. Yes.
4	Q. And it goes on to say: This is
5	especially true for election disinformation that
6	originates from within the United States, which
7	would likely be excluded from law enforcement
8	action under the First Amendment and not
9	appropriate for study by intelligence agencies
10	restricted from operating inside the United
11	States; correct?
12	A. That's what it says, yes.
13	Q. Okay. And are you aware of any
14	discussions at GEC of, you know, setting up a
15	collaboration with nongovernmental third parties
16	to engage in activities that the GEC would be
17	prohibited from engaging in under the First
18	Amendment?
19	MR. KIRSCHNER: Objection, to the
20	extent this is asking for attorney-client
21	information, I would instruct the witness not to
22	answer, to the extent you can answer without
23	BY MR. SAUER:
24	Q. Yeah, I'm not asking for anything
25	the lawyers told you in the context of

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1	representing you. I'm just asking for
2	conversations within the GEC about working with
3	outside third parties to conduct activities that
4	the GEC could not do because of First Amendment
5	restrictions.
6	MR. KIRSCHNER: Again, objection,
7	I'm instructing the witness not to answer to
8	include any attorney-client communication within
9	the Department of State about what can and
10	cannot be done.
11	MR. SAUER: I'm not asking for
12	that.
13	Go ahead.
14	MR. KIRSCHNER: Well, no, I'm
15	instructing him not to answer about about
16	attorney-client communication, to the extent he
17	can answer that is outside of any legal
18	advice
19	THE WITNESS: Right.
20	MR. KIRSCHNER: received in the
21	context of this question, he can answer.
22	A. Outside of legal advice, I'm not
23	aware of any conversations at the GEC that would
24	involve any infringement on First Amendment
25	rights.

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1	Q. Flip ahead to page 6, Arabic 6.
2	Do you see there's a kind of list
3	of the goals of the Election Integrity
4	Partnership?
5	A. Yes.
6	Q. Are you aware of the GEC having any
7	input in the formulation of their goals?
8	MR. KIRSCHNER: Objection,
9	speculative, asked and answered.
10	BY MR. SAUER:
11	Q. Are you aware?
12	A. No, I'm not aware of any GEC input
13	into these goals.
14	Q. Bottom left corner of this page, of
15	this diagram, you see it says: Flag policy
16	violations for platforms; correct?
17	A. Yes.
18	Q. Okay. Are you aware of anyone at
19	the GEC working with EIP to flag policy
20	violations for platforms?
21	MR. KIRSCHNER: Objection,
22	speculative, asked and answered.
23	A. No, I'm not aware.
24	Q. Flip ahead to page 8, it talks
25	about how the EIP tracked its analysis topics

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1		
1	and engaged it with outside stakeholder	
2	organizations using an internal ticketed work	
3	flow management system; correct?	
4	A. Where is this?	
5	Q. I'm sorry, very bottom, full	
6	paragraph?	
7	A. Okay.	
8	Q. Second sentence or sorry	
9	first sentence there.	
10	A. Okay.	
11	Q. Third sentence, there, goes on to	
12	say: Tickets were submitted by trusted external	
13	stakeholders, as detailed in section 1 sorry,	
14	1.4 and internal EIP analyst; do you see that?	
15	A. I do see that.	
16	Q. Do you know who the trusted	
17	external stakeholders were who were submitting	
18	tickets to the EIP?	
19	MR. KIRSCHNER: Objection,	
20	speculative, asked and answered.	
21	BY MR. SAUER:	
22	Q. Do you know?	
23	A. No, I do not.	
24	Q. Now, there's a reference there to	
25	section 1.4 on page 11, right? There it	

1 identifies external stakeholders; correct?
2 A. Yes.
Q. And there it starts saying: The
4 EIP served as a connector for many stakeholders
5 and so forth; right?
6 A. Mm-hmm.
7 Q. The next sentence, which is on page
8 12, first full sentence on page 12, said:
9 External stakeholders included government, civil
society, social media companies and news media
11 companies; correct?
12 A. Yes.
Q. Okay. And so the external
14 stakeholders include some governmental entities
15 correct?
16 A. Yes.
Q. According to the report?
18 Is the GEC one of them?
19 MR. KIRSCHNER: Objection, lack of
20 foundation, speculative.
21 A. I I see the GEC listed here,
22 yes.
Q. Down there under four, you're
getting ahead of me, down there under four,
25 major stakeholder groups; right?

1 A. Yes.
2 Q. And those external stakeholders are
3 the ones listed in the reports as government
4 partners, quote, could create tickets or send
5 notes to EIP analysts, and they used these
6 procedures to flag incidents or emerging
7 narrative to be assessed for EIP analysis?
8 MR. KIRSCHNER: Objection,
9 mischaracterizes evidence, lack of foundation.
10 BY MR. SAUER:
Q. Do you see where it says that in
the first sentence, in the first full paragraph
of this page, exactly as I read it?
14 A. I do see that.
Q. Was the GEC one of those government
partners who could create tickets or send notes
to EIP analysts and use those procedures to flag
18 incidents or emerging narratives?
19 MR. KIRSCHNER: Objection,
20 speculative.
21 BY MR. SAUER:
Q. Do you know?
23 A. I don't know, beyond what's written
24 here.
Q. Okay. And down there in the middle

1	of the diagram, in the middle, where it
2	identifies four major stakeholder groups, the
3	first one is government; right?
4	A. Yes.
5	Q. And there's three partners listed,
6	the elections infrastructure, ISAC; do you know
7	what that is?
8	A. No, I don't.
9	Q. And CISA; correct?
10	A. Yes.
11	Q. And then GEC; correct?
12	A. Yes.
13	Q. So GEC is at least identified in
14	this report as a major stakeholder group;
15	correct?
16	A. It's listed as a member of a major
17	stakeholder group, yes.
18	Q. Right, right, right, it's one of
19	three members of a major stakeholder group. And
20	the report says that external stakeholders,
21	trusted stakeholders, include government;
22	correct, up there at the top?
23	A. Yes.
24	Q. And that those stakeholders,
25	including government partners, could submit

1	tickets to the EIC; right?
2	A. Yes.
3	MR. KIRSCHNER: Objection, lack of
4	foundation.
5	BY MR. SAUER:
6	Q. Did anyone authorize do you
7	remember anyone authorizing anyone at GEC to
8	submit tickets to the EIP?
9	MR. KIRSCHNER: Objection, lack of
10	foundation, mischaracterizes evidence.
11	A. No, I don't recall that.
12	Q. Did you authorize that?
13	A. I don't recall authorizing it.
14	Q. Who was that? Who was in charge
15	of like, who was in charge of GEC during the
16	period from, you know, the three months prior to
17	the 2020 election?
18	A. It would have been coordinator Lea
19	Gabrielle.
20	Q. Okay. Do you know if she ever
21	issued any orders about the GEC of any kind.
22	A. If she issued any orders about the
23	GEC of any kind?
24	Q. Yeah, do you know if she did? Do
25	you know if she gave any directive to anyone

1	sorry do you know if she gave any directive
2	to anyone at GEC about EIP of any kind?
3	A. No, I don't.
4	·
	Q. Can you turn to the next page.
5	Do you see how there's a section
6	there called EI-ISAC?
7	A. Yes.
8	Q. Do you know what EI-ISAC is?
9	A. No.
10	Q. There, it says: The election
11	infrastructure information sharing and analysis
12	center analysis center, which is run by The
13	Center For Internet Security; do you know what
14	that is?
15	A. No, I do not.
16	Q. Are you aware of any relationship
17	between The Center For Internet Security and
18	CISA?
19	A. No.
20	Q. Can you turn to page 17, talks
21	about using platforms, in the middle of the
22	page, under there it says: The EIP established
23	relationships with social media platforms to
24	facilitate flagging of incidents for evaluation
25	when content or behavior appeared to violate

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1	<pre>platform policies; correct?</pre>
2	A. Yes.
3	Q. So the EIP wanted to facilitate
4	flagging of incidents for evaluation when there
5	appeared to be a content modulation policy; is
6	that what it's saying?
7	MR. KIRSCHNER: Objection, lack of
8	foundation.
9	A. No. It's saying flagging of
10	incidents for evaluation when content or
11	behavior appeared to violate platform policies;
12	it doesn't say anything about modulation.
13	Q. Okay. Are you aware of anyone at
14	the GEC flagging incidents for evaluation of any
15	kind for for social media platforms?
16	MR. KIRSCHNER: Objection to form.
17	BY MR. SAUER:
18	Q. Let me rephrase that.
19	Are you aware of anyone at the GEC,
20	quote, flagging of incidents for evaluation for
21	social media platforms in any way?
22	A. Not that I recall.
23	Q. Can you flip ahead to page 27?
24	A. Mm-hmm.
25	Q. If you see under key findings, it

1	says: We processed 639 in-scope tickets?
2	A. Yes.
3	Q. And then it says, 72 percent of
4	these tickets were related to delegitimizing the
5	election results; correct?
6	A. Yes.
7	Q. Then down at the bottom, it says:
8	35 percent of the URLs we shared with Facebook,
9	Instagram, Twitter, TikTok and YouTube were
10	either labeled removed or soft blocked; correct?
11	A. I see that, yes.
12	Q. So their data indicates that they
13	processed hundreds of tickets, 72 percent of
14	them related to delegitimizing of election
15	results; correct?
16	A. Yes.
17	Q. And then some sort of action was
18	taken by the social media platforms, either
19	labeling, removing, or soft blocking 35 percent
20	of them?
21	MR. KIRSCHNER: Objection, lack of
22	foundation, speculative.
23	A. Yes, I see that sentence.
24	Q. Did GEC have any involvement in
25	seeking the soft blocking, removal or or

1	or other action against any content on the
2	internet?
3	MR. KIRSCHNER: Objection,
4	speculative, asked and answered.
5	A. I'm not I don't know of any GEC
6	actions of that type.
7	Q. Can you go to page 30? And I've
8	got a kind of internal communication, electronic
9	communication chain here, between the government
10	partner, a platform partner, and EIP member; do
11	you see that?
12	A. I do.
13	Q. And the government the platform
14	partner and government partner are redacted over
15	the person who was actually participating in the
16	conversation; do you know who those were?
17	MR. KIRSCHNER: Objection,
18	speculative.
19	A. No, I don't.
20	Q. Could you go to page 33? Do you
21	see in the second paragraph there, at the
22	bottom, there's a reference to the
23	gatewaypundit.com?
24	A. Where is this?
25	Q. Second paragraph, last sentence.

	_
1	A. Yes, I see that.
2	Q. And it says: The top
3	misinformation-spreading websites were the far
4	right forum theDonald.win, blah, blah, blah,
5	blah, blah, and the gatewaypundit.com, a far
6	right news website?
7	A. I see that.
8	Q. Have you ever heard of the
9	gatewaypundit.com?
10	A. I may have. I don't I don't
11	recall any details.
12	Q. Have you ever heard it discussed in
13	any meetings with any government officials?
14	A. No, I don't recall.
15	Q. And would it surprise you to learn
16	that it's cited 49 times in this report?
17	MR. KIRSCHNER: Objection, lack of
18	foundation, speculative.
19	A. I I have no it doesn't
20	surprise me or not surprise me.
21	Q. Do you know do you remember any
22	discussion of any kind relating to the
23	gatewaypundit and social media content relating
24	to the elections?
25	A. No, I don't.

1	Q. You don't?
2	Could you go to page 35. Do you
3	see there, right above the bold heading, tickets
4	by fact-checking URLs, there's a paragraph?
5	A. Yes.
6	Q. And the report states that last, we
7	coded tickets based on whether they additionally
8	related to COVID-19 narratives, or had an
9	element of foreign interference; correct?
10	A. Yes.
11	Q. And it says remember, there were
12	639 tickets referred to earlier; do you recall
13	that?
14	A. Yes.
15	Q. And it says: Interestingly, just
16	one percent of the tickets related to COVID-19,
17	and less than one percent related to foreign
18	<pre>interference; correct?</pre>
19	A. Yes.
20	Q. So if less than one percent related
21	to foreign interference, it seems that over 99
22	percent of what the EIP was doing with its
23	tickets related to stuff that's kind of outside
24	what you've described as the mission of GEC; is
25	that fair to say?

1	MR. KIRSCHNER: Objection, lack of
2	foundation, speculative, asked and answered.
3	BY MR. SAUER:
4	Q. Is that is that fair to say?
5	A. No, because a foreign-originated
6	narrative can relate to anything. This is just
7	talking about the narratives are related to
8	foreign interference. A COVID-related narrative
9	could originate with a foreign malign influence
10	factor. This doesn't tell you anything about
11	that, so no, I would I would disagree.
12	Q. So you think that GEC could flag
13	things for the EIP that wouldn't be related to a
14	foreign interference?
15	MR. KIRSCHNER: Objection,
16	mischaracterizes testimony.
17	A. No. What I said is that a foreign
18	disinformation narrative does not necessarily
19	have to be related to foreign interference. The
20	Russian propaganda and disinformation is not
21	about Russian interference. It could be about
22	COVID, it can be about anything.
23	The foreign actor behind it, and
24	the subject of foreign interference, those two
2.5	
25	things are not equivalent.

1	You cannot conclude that 99 percent
2	of the narratives had no relation to a foreign
3	actor just because they weren't related to
4	foreign interference. They could be about
5	anything and still originate with the foreign
6	actor.
7	Q. I got you. So so that's a
8	distinction between the originator of the
9	narrative and the content of the narrative, fair
10	to say, that you're drawing?
11	A. Yes.
12	Q. Okay. So foreign interference
13	tickets would relate to foreign I take it
14	foreign interference in elections or go
15	ahead.
16	A. The subject of the narrative in the
17	foreign or non-foreign origination, the nexus to
18	a foreign actor, are not necessarily related.
19	You can't draw a conclusion about a
20	nexus to a foreign actor and, therefore, the GEC
21	mandate, based on the focus of the narrative.
22	Q. So, in other words, you could have
23	a COVID narrative that's false, has nothing to
24	do with foreign interference, but it might be of
25	concern to the GEC because it originated with

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1	China an Bussia fan arannlas
1	China or Russia, for example?
2	A. Correct.
3	Q. And there could be other
4	narratives, as well.
5	Why don't you flip ahead to
6	let's flip ahead to page 38.
7	A. Okay.
8	Q. Do you see the graph there at the
9	top of the part of the page, a bar graph?
10	A. Yes.
11	Q. And it says: Percent of tickets by
12	organization flagged; right?
13	A. Yes.
14	Q. And GEC's kind of there in the
15	middle, right, indicating that something between
16	zero and ten percent of tickets were flagged by
17	the GEC?
18	A. Well, it's in the middle of the
19	graph, but it seems to be quite far down, if you
20	add up the percentages.
21	Q. Right. What's below Facebook and
22	Twitter, for example, and well below the EE at
23	ISAC; correct?
24	A. Yes.
25	Q. But it looks like that bar is

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1	somewhere between zero and ten; right?
2	A. It looks like it's between zero and
3	five.
4	Q. Yeah, I agree with that, too.
5	Do you have any idea what was being
6	flagged by GEC for the EIP?
7	A. No, I don't.
8	Q. Okay. Turn to the next page, just
9	a number there, do you see in the towards the
10	bottom of the page, in the second to last
11	paragraph, there's reference to a web scraping
12	tool and how they ran it on all 4,832 URLs in
13	the tickets; right?
14	A. Yes, I see that.
15	Q. So the 639 tickets involved a lot
16	more than 639 URLs; correct?
17	MR. KIRSCHNER: Objection,
18	speculative.
19	A. The relationship between the
20	tickets and URLs is not clear to me here.
21	Q. Page 42, can you turn ahead to
22	that, bottom of the page, concerns by reporting
23	collaborators, correct, very last sentence?
24	Other groups that it reported tickets include
25	the State Department's Global Engagement Center;

1	correct?
2	A. Yes, I see that.
3	Q. And again, you have no idea what
4	those were; is that fair to say?
5	A. I don't know what they were.
6	Q. Do you know how this reporting was
7	done, do you know if there was, like, an online
8	kind of platform to do it, that you logged into
9	or
10	A. I I don't know anything about
11	the the mechanics.
12	Q. Okay. Later, in page 51, you need
13	to read it, there's a reference to general
14	concerns relating to mail-in ballots, it says:
15	That constituted the most prominent type of
16	misinformation assessed in the months leading up
17	to election day.
18	Have you ever heard discussions of
19	that in the GEC in any connection?
20	A. No.
21	Q. So you you you're not aware
22	of any discussions or conversations within the
23	GEC about, you know, disinformation relating to
24	the security of voting by mail?
25	A. No, I'm not.

1	Q. Including such disinformation that
2	might have originated as a foreign narrative or
3	anything like that?
4	A. No, I'm not aware of any
5	discussions within the GEC about disinformation
6	narratives related to mail-in ballots.
7	Q. Are you aware of any narratives
8	relating to mail-in ballots that are
9	disinformation?
10	MR. KIRSCHNER: Objection, vague.
11	BY MR. SAUER:
12	Q. You can answer.
13	A. I believe there were Russian
14	narratives on the overall integrity of the
15	elections. I don't recall all the specifics.
16	Q. Do you know what the generally,
17	what those narratives said?
18	A. I I don't recall the specifics.
19	Q. Were those narratives discussed
20	within the Russia team that you mentioned
21	Mr. Beebe is a member of?
22	A. I I don't know what the internal
23	discussions of the Russia team were.
24	Q. Do you remember anything about what
25	they said about those narratives?

1	MR. KIRSCHNER: Objection, asked
2	and answered.
3	A. No, I do not.
4	Q. If you flip way ahead, to page 183,
5	the very middle paragraph of that page, it
6	discusses there incident-related tweet data;
7	correct?
8	MR. KIRCHNER: Objection.
9	A. Which paragraph is this?
10	Q. Are you on page 183?
11	A. Yes.
12	Q. It's the last paragraph before the
13	heading: Facebook and Instagram data
14	collection?
15	A. Yes, I see that.
16	Q. And there it talks about earlier
17	I talked about how there were, you know,
18	thousands of URLs, talks about number of tweets
19	affected, that last number is 21,897,364 tweets;
20	correct?
21	A. Yes, I see the number.
22	Q. And is that the is that a scope
23	of how many tweets were affected by the or
24	considered by the EIP's tickets?
25	MR. KIRSCHNER: Objection, lack of

1	foundation, speculative.
2	A. It says that their incident-related
3	tweet data included the relationships are not
4	entirely clear to me included 5,888,771
5	tweets and retweets from ticket status from
6	ticket status IDs directly, 1,094,115 tweets and
7	retweets, collected first from ticket URLs, and
8	14,914,478 from key word searches, for a total
9	of 21,897,364 tweets. It's not entirely clear
10	to me what that means.
11	Q. Can you flip ahead to page 211.
12	There's a chapter six called policy.
13	A. Mm-hmm.
14	Q. And there in the first paragraph,
15	in the third line, it says: During the 2020
16	election all the major platforms made
17	significant changes to election integrity
18	policies; correct?
19	A. Yes, I see the sentence.
20	Q. And without, you know, going to all
21	the tabs, also in the report they talk about how
22	the EIP actually kind of pushed for those
23	changes; is that right?
24	MR. KIRSCHNER: Objection, lack of
25	foundation.

1	A. I haven't read the full report.
2	Q. Are you aware of public statements
3	to that effect, that the EIP advocated for more
4	restrictive election-integrity policies at the
5	major social media platforms?
6	A. No, I didn't track the EIP's public
7	statements.
8	Q. Do you have any knowledge of the
9	GEC being involved in advocating for more
10	restrictive content modulation policies with
11	respect to elections at social media platforms?
12	A. No.
13	Q. Do you have any knowledge of anyone
14	at the GEC being involved in any kind of, you
15	know, advocacy or argument relating to content
16	modulation policies of any kind?
17	MR. KIRSCHNER: Objection, vague,
18	ambiguous.
19	A. Do you mean advocating to change
20	their policies?
21	Q. Correct.
22	A. No.
23	Q. How about any discussion of content
24	modulation policies at the GEC in any
25	connection?

1	MR. KIRSCHNER: Objection, vague,
2	ambiguous.
3	A. Can I ask you to clarify? I
4	haven't heard the term: Content modulation,
5	before. I've heard content moderation.
6	Q. Why don't we use content
7	moderation, then.
8	A. Okay.
9	Q. You understand to you, what does
10	content moderation policy mean?
11	A. I'm not going to define I don't
12	know how the social media companies define that,
13	specifically.
14	Q. How do you understand it as a go
15	ahead.
16	A. Their terms of service.
17	Q. And are they, in particular, their
18	terms of service as it permits them to either
19	de-emphasize, block, remove, or de-platform
20	content that they deem to be inappropriate, is
21	that content moderation?
22	A. I I I don't know the
23	specifics for each company, but it's, I believe,
24	how they how they determine what is
25	appropriate and inappropriate content on their

1	platform.
2	Q. And then and then take action
3	against inappropriate content; correct?
4	A. Potentially.
5	Q. Okay. And can I, for the purpose
6	of my next line of questions with you, can we
7	use it that way, as referring to the policies of
8	the social media platforms by which they
9	determine what's appropriate and inappropriate
10	content, and potentially take some kind of
11	action against inappropriate content?
12	A. With the caveat that I don't know
13	specifically how the companies, themselves,
14	define it.
15	Q. Sure. And my only question is:
16	Are you aware of that general issue, which we
17	were calling content moderation policies, being
18	discussed at the GEC in any connection?
19	A. No. The GEC didn't engage on the
20	specifics of their content moderation policies.
21	Q. Were there ever any discussions
22	within the GEC about content moderation policies
23	and how they might apply to, say, Russian, you
24	know, originated narratives?
25	MR. KIRSCHNER: Objection. To the

1	extent this is asking for deliberative
2	information within the GEC, I instruct the
3	witness not to answer on privileged grounds. To
4	the extent you can answer without getting into
5	internal deliberations, you may answer.
6	BY MR. SAUER:
7	Q. For starters, can you identify
8	whether you're aware of any such conversations
9	without identifying the content of such
10	conversations.
11	A. I'm not aware of conversations
12	specifically focused on content moderation
13	policies at specific social media companies.
14	Q. Other than specifically focused,
15	are you aware of conversations or discussions
16	that address that issue in any way?
17	A. I think the only context would be
18	the platforms periodically released public
19	statements on campaigns they identified and
20	things that they took down. And we looked at
21	those public statements like like like
22	everybody else.
23	But that wasn't focussed on the
24	moderation policies. It was focused on how they
25	were looking at foreign propaganda and

1	disinformation actors.
2	Q. Do you remember a specific public
3	statement of that kind, like, did Facebook ever
4	say, hey, we've decided to take down, you know,
5	allegations that the US government manufactured
6	AIDS in a lab in the 1970s?
7	A. No, because each platform releases
8	them regularly. I don't remember a specific
9	one, no.
10	Q. So it happens frequently?
11	A. (Nodding.)
12	Q. And that's something sorry, it
13	happens frequently?
14	A. Yes, it I don't remember the
15	frequency at each social media company, but
16	they they release them periodically.
17	Q. Why do you track that information?
18	MR. KIRSCHNER: Objection,
19	assuming mischaracterizing testimony and
20	vague. You said: "That information."
21	BY MR. SAUER:
22	Q. Why do you track the information
23	that is released by the social media companies?
24	A. It's publicly-released information
25	that's also covered in the media, and we look at

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1	it to stay informed about the tools, techniques,
2	and campaigns of foreign propaganda and
3	disinformation actors.
4	Q. Do you know whether the EIP is
5	still functioning?
6	A. I don't.
7	Q. Do you know if they had activities
8	that relate to the 2022 election that just
9	finished on Tuesday?
10	A. I don't.
11	Q. And do you know whether they plan
12	to have, you know, activity with respect to
13	future elections, like 2024?
14	A. No.
15	Q. Do you know if GEC is still
16	involved in the EIP in any capacity?
17	MR. KIRSCHNER: Objection, assumes
18	evidence not on record, lack of foundation,
19	vague.
20	BY MR. SAUER:
21	Q. Do you know?
22	A. No.
23	Q. You do not know?
24	A. I do not.
25	Q. For example, Mr. Beebe, is he still

1	at GEC?
2	A. I believe he is.
3	Q. And then the other lady you
4	mentioned, I can't remember her name.
5	A. Adele Ruppe is no longer at the
6	GEC.
7	Q. She's no longer at the GEC? And
8	you don't know if either they or anyone else is
9	still interacting with EIP in any way?
10	A. I don't, no.
11	MR. KIRSCHNER: If you're done with
12	that exhibit, then can we take a five-minute
13	break?
14	MR. SAUER: Yeah, sure. Yeah.
15	Yeah. I'll go through the remaining exhibits
16	during the break and see what we can do to move
17	forward.
18	MR. KIRSCHNER: All right. Do you
19	have a sense sorry, let's go off the record
20	first.
21	THE VIDEOGRAPHER: All right. The
22	time is 3:21 p.m. We are off the record.
23	(Recess.)
24	THE VIDEOGRAPHER: The time is 3:31
25	p.m. We're back on the record. Please proceed.

-1	
1	MR. SAUER: You're being handed
2	Exhibit 13, it's just a one-pager.
3	(Exhibit No. 13 was marked for
4	identification.)
5	BY MR. SAUER:
6	Q. And this is a website called
7	Facebook Content Requests, that says that this
8	portal is for on-boarded partner requests
9	pertaining to content issues at Facebook and
10	Instagram; have you ever seen a website like
11	this?
12	A. I don't believe so.
13	Q. Are you familiar with anyone at GEC
14	having authority to use a website that provides
15	a kind of privileged or sort of line of
16	communication with social media platform?
17	MR. KIRSCHNER: Objection, lack of
18	foundation, speculative.
19	BY MR. SAUER:
20	Q. Are you aware of any?
21	A. I I'm not aware of any specific
22	individual at GEC, no.
23	Q. Have you ever heard of the phrase:
24	Partner support portal?
25	A. No, not before you just used it.

1	Q. Okay. Are you aware of certain
2	social media platforms having lines of
3	electronic communication or websites that their
4	partners can log into to report issues relating
5	to content on their platforms?
6	A. Yes, I'm aware that there are
7	portals where users can or anyone can report
8	issues, I believe.
9	Q. Are you aware of anyone at the GEC
10	using any such portal?
11	A. I'm not aware of any I'm not
12	aware of any specific instance of someone using
13	a portal like that.
14	Q. Are you aware of any discussions
15	with the FBI about a Russian hack and leak
16	operation that was anticipated to occur in late
17	2020?
18	MR. KIRSCHNER: Objection. To the
19	extent this is calling for law enforcement
20	activity, and Mr. Kimmage is aware of any such
21	law enforcement activity, I would instruct the
22	witness not to answer.
23	To the extent you can answer
24	without engaging in discussion of law
25	enforcement or other deliberative information,

1	you may answer.
2	A. I'm not aware of any specific
3	discussion. Could you be more specific?
4	Q. Sure. Did you hear, at any time,
5	that the FBI had raised any kind of concerns
6	relating to a Russian hack and leak operation or
7	hack and release operation is, I think, how you
8	described it earlier, in 2020?
9	MR. KIRSCHNER: Again, same
10	objection. To the extent this is calling for
11	internal deliberations or a law enforcement
12	information that is privileged, I instruct the
13	witness not to answer. To the extent that you
14	can answer without revealing potential
15	privileged information, you may proceed.
16	A. I don't recall, and I can't speak
17	for FBI's concerns and activities in the period.
18	Q. Do you recall do you recall
19	there being any concern, in any quarter, about a
20	hack and release operation that the Russians
21	might employ in the 2020 election cycle?
22	MR. KIRSCHNER: Again, I instruct
23	the witness object. I instruct the witness,
24	to the extent that this is calling for law
25	enforcement information or even classified

1	information, I instruct the witness not to
2	answer.
3	To the extent the witness can
4	answer without divulging such information, the
5	witness may proceed.
6	A. Given that reporting would have
7	potentially occurred through classified
8	channels, I don't feel that I can answer that
9	in in open discussion.
10	Q. Let me let me tease that out a
11	little bit.
12	So are you withholding any
13	information, in response to my question, because
14	of the instruction the conditional
15	instruction you received from your counsel.
16	A. No. I'm not aware of any specific,
17	but because communication on topics like this
18	would have occurred generally through classified
19	channels I don't feel that I can answer that
20	here.
21	Q. So your answer to my question is,
22	no, you're not withholding any information on
23	the grounds of privilege in responding to my
24	question?
25	A. No.

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1	Q. That is not your answer? Sorry,
2	let's
3	A. Could you clarify that?
4	Q. I just want to know, we've had I
5	asked you a question.
6	A. Right.
7	Q. And your lawyer said: To the
8	extent that your answer raises classified
9	information or law enforcement information I
10	instruct you not to answer.
11	And you said I'm not clear
12	whether you know of something that relates to a
13	hack and leak operation, but you're not going to
14	tell me because you received a privilege
15	instruction?
16	A. Right.
17	Q. Or you don't know anything.
18	Those are two totally different
19	answers?
20	A. Right.
21	Q. And I'm not asking for the content
22	of any such communication.
23	A. Right.
24	Q. Right? Because we get to that in a
25	minute. I just want to know if there is such

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1	communication.
2	A. I'm not aware of anything specific.
3	Q. Okay. So you're not withholding
4	any information from me on grounds of privilege
5	in response to that question?
6	A. I'm not withholding anything
7	specific.
8	Q. So you're not aware of any concern
9	raised in any quarter about a Russian hack and
10	release operation with respect to the 2020
11	election?
12	A. Could you be more specific? Is
13	there a specific operation?
14	Q. Well, if you've read our complaint
15	you may know there's allegations relating or
16	read some of our pleadings, at least you may
17	know there's allegations that there were
18	communications to certain social media platforms
19	from the federal government that said: We
20	anticipate a Russian hack and release operation
21	in October of 2020.
22	So remember, there was the 2016
23	hack and release operation, we talked about
24	before; right?
25	A. Right.

1 Q. And are you aware of any let me
2 put it this way: Are you aware of any
3 communication between any federal official, in
4 any social media platform, that related to any
5 concern about a Russian hack and release
6 operation that might or might be planned for the
7 2020 election cycle?
8 A. Are you asking about GEC?
9 Q. No. I'm asking about any federal
10 official, when I said any federal official.
11 A. I can't speak for any federal
12 official.
Q. I'm asking you: Do you know of
14 any, are you aware?
15 A. I'm note aware of any.
16 Q. How about GEC, are you aware of any
17 GEC communication with any social media platform
about any concern or anticipated Russian hack
and release operation with respect to the 2020
20 election?
21 A. I don't recall any GEC
22 communications about Russian hack and release
23 operations.
Q. How about State Department, any
25 communication from State Department?

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1	Α. Ι	can't speak for the entire
2	department.	
3	Q. O	kay.
4	A. I	'm not aware.
5	Q. A	re you aware?
6	A. N	om I'm not aware.
7	Q. A	are you aware how about CISA or
8	DHS, are you a	ware of any communication or
9	anything like	that from that quarter?
10	A. I	can't speak to their
11	communications	
12	Q. A	re you aware?
13	A. I	'm not aware of any.
14	Q. A	and how about the FBI, are you
15	aware of any c	communications from FBI or FTIF to
16	any social med	lia platform that relates to that?
17	Α. Ι	'm not aware, no.
18	M	IR. SAUER: Can you give me S?
19	Y	ou're being handed Exhibit 14.
20	(Exhibit No. 14 was marked for
21	identification	1.)
22 B	BY MR. SAUER:	
23	Q. D	o you recognize this document?
24	A. Y	es.
25	Q. A	and what is it?

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1	A. It's a transcript of a talk I gave
2	in 2021.
3	Q. And was this at the Washington
4	Institute For Near East Policy?
5	A. Yes.
6	Q. The bottom of the first page, you
7	talk about: Technology is woven into virtually
8	aspects of this problem and you're trying to
9	trying to stay ahead of the curve; right?
10	A. Yes.
11	Q. And spilling onto the next page,
12	you talk about counter-disinformation
13	technologies and their implementation?
14	A. Yes.
15	Q. At what what are those? What
16	are the counter-disinformation technologies that
17	you're talking about there and their
18	implementation?
19	A. So as I detailed earlier, they
20	could be software that would help to identify
21	coordinated inauthentic activity by a foreign
22	propaganda and disinformation.
23	Q. Any anything else, other than
24	tracking propaganda and disinformation?
25	A. There's a wide array of

1	technologies. I I can't list them all. I
2	can there there are many different
3	technologies that can be applied to the problem.
4	Q. Can you give me a better picture of
5	what they're like? I know we had some type of
6	discussion of this earlier, and I didn't come
7	away with any
8	A. Sure.
9	Q real grasp of what these
10	technologies are?
11	A. Right.
12	Q. And I'm not a techie person.
13	A. Sure.
14	Q. But can you clarify that, at all?
15	A. So with the caveat that I'm also
16	not a technology expert, it would be, you know,
17	a tool that could analyze data to cast light on
18	how Russia or China is trying to manipulate
19	online discourse, it could be a tool that raises
20	awareness, for example, a game that people play,
21	to understand how disinformation is introduced
22	by a foreign actor, something that raises their
23	awareness, it could be a tool like that, for
24	example.
25	It could be an interactive website

1	that shows Chinese investments in the tech
2	sector, for example, to show how Chinese
3	influence is expanding in the tech sector. And
4	that is a computed as a technology-driven
5	tool that helps to counter propaganda and
6	disinformation, because, of course, China's
7	propaganda is that they're not doing this, in
8	fact, they are doing this.
9	And when you're casting light on it
10	with, for example, a data rich website that
11	would show that, you're countering their
12	propaganda.
13	Q. Lower down on that page, second
14	paragraph from the bottom
15	A. Mm-hmm.
16	Q you talk you talk about their
17	work, your work in the context of the COVID
18	crisis; correct?
19	A. Yes.
20	Q. And you you talk about how they
21	would COVID involved a new wave of propaganda
22	and disinformation; right?
23	A. Where does it say that?
24	Q. I'm paraphrasing, it rapidly became
25	clear that this would be an issue of global

1	consequence, not simply in the scope of the
2	crisis but also in our area of propaganda and
3	disinformation; correct?
4	A. Yes.
5	Q. Okay. And you talked about Russia
6	pushing conspiracy theories. Do you know what
7	those were? What were you talking about there?
8	A. Yeah, as I detailed earlier, they
9	were propaganda narratives and disinformation
10	narratives about the origins of the virus, about
11	the efficacy of US and Western-developed
12	vaccines, about the efficacy of Russian
13	vaccines. These were propaganda narratives that
14	Russia sought to use in the context of the
15	pandemic.
16	Q. And you go on to say: We saw the
17	Peoples Republic of China suggesting various
18	false and nefarious narratives about the origin
19	of the virus. Do you remember what is that
20	right?
21	A. Yes.
22	Q. Do you remember what those
23	narratives were or are?
24	A. Some of them alleged a US role. I
25	don't recall the specifics, but along the lines

1	of the notorious KGB operation alleging a US
2	government role in the creation of the AIDS
3	virus, there were Chinese propaganda narratives
4	that suggested some sort of US role, and there
5	were Russian narratives that suggested the same
6	things.
7	Q. What was that what role did
8	China say or
9	A. Right.
10	Q Chinese actors say that the US
11	had in the origin of the virus?
12	MR. KIRSCHNER: Objection, calls
13	for a narrative response.
14	A. With the caveat that I don't recall
15	all the specifics, it would be that US medical
16	research led to the creation of a virus.
17	There are many different
18	narratives, it would be alleging some nefarious
19	US government role.
20	Q. That the government so you said
21	US medical research funded by the government, is
22	that a narrative that the Chinese propagated?
23	MR. KIRSCHNER: Objection,
24	mischaracterizes testimony.
25	A. It it's a narrative that I know

1	Russian propagandists have used. I don't recall
2	whether Chinese propagandists used that specific
3	narrative discussion. I know Russian
4	propagandists did.
5	Q. What Chinese-specific narratives do
6	you remember about the origins of the virus?
7	You've got a robust reference to them here, and
8	I just wonder if I can get my head around what
9	you're talking about.
10	A. The primary Chinese narratives, as
11	I recall, were really about how well China
12	responded to the pandemic compared to Western
13	countries. But I also recall that they disputed
14	and suggested alternative theories for the
15	emergence of the virus. And some of them
16	alleged a nefarious US government role.
17	Q. Do you remember what that role was
18	that they alleged?
19	A. No, I don't remember the specifics.
20	Q. What did they say about what did
21	these narratives say about the first thing you
22	said, which had to do with how the Chinese
23	response was more successful?
24	A. It would be touting how well how
25	quickly China responded, how effectively they

1	responded, and contrasting that with, for
2	example, Western countries, like Italy, that
3	struggled, initially, in dealing with the virus.
4	Q. Was that was that disinformation
5	is, in fact, false that China did a better job
6	of responding to the virus?
7	A. This would be more propaganda,
8	where they are selectively highlighting things
9	that are not necessarily false, but in the
10	context or misleading. So this is the
11	distinction between propaganda and
12	disinformation.
13	Q. Can you flip to the next page.
14	A. Mm-hmm.
15	Q. At the top there, very top of the
16	page, at the bottom of that first paragraph, you
17	say: Finally, we provided rapid response grants
18	to local organizations on the front lines,
19	fighting the adversarial narratives of the COVID
20	info-demic, as some have called it.
21	What's what's involved there?
22	A. I believe we had a program with
23	several embassies abroad, where we provided
24	rapid response grants to foreign organizations
25	fighting, generally, Russian and propaganda

1	Chinese propaganda and disinformation in their
2	local environments.
3	Q. So those grants went to foreign
4	foreign entities abroad?
5	A. Yes.
6	Q. And what what sorts of entities
7	would get them, would they be, like, local news
8	stations or who was fighting the COVID
9	info-demic abroad?
10	A. Generally, they would be civil
11	society organizations or potentially research
12	organizations.
13	Q. What's a civil society
14	organization?
15	A. A non-governmental organization
16	that is focused on a particular issue.
17	Q. Halfway down this page, at the
18	bottom and that middle paragraph, you say: I
19	would note in the counterterrorism context an
20	increasing focus on racially and ethnically
21	motivated violent extremism REMVE, what are you
22	talking about there, what are you referring to?
23	A. I'm referring to extremist
24	organizations that are promoting white supremacy
25	or similar racial and racially and ethnically

1	motivated narratives to justify violent
2	extremism.
3	Q. And are those is that something
4	that the GEC kind of tracks or monitors or pays
5	attention to?
6	MR. KIRCHNER: Objection,
7	mischaracterizes the testimony.
8	BY MR. SAUER:
9	Q. That's a question, is it
10	something
11	A. The counterterrorism team at the
12	Global Engagement Center looks at violent
13	extremist organizations abroad and how they seek
14	to recruit people.
15	And as there has been an upswing in
16	the activity of groups focused on racially and
17	ethnically motivated violent extremism the
18	Global Engagement Center's counterterrorism team
19	has begun to look at those groups.
20	Q. Are you saying those those
21	are those strictly groups abroad or does that
22	include domestic violent extremist groups?
23	A. Those are groups abroad.
24	Q. Okay. Do you does Global
25	Engagement Center have any role with respect to

1	tracking or paying attention to domestic
2	racially or ethnically motivated violent
3	extremist groups?
4	A. No, it does not.
5	Q. What agency does that?
6	MR. KIRSCHNER: Objection.
7	BY MR. SAUER:
8	Q. If you know.
9	MR. KIRSCHNER: Lack of foundation,
10	speculative.
11	A. The the federal law enforcement
12	and federal and local law enforcement agencies.
13	Q. Turning to the next page, in that
14	second to last paragraph in the second line,
15	there's another reference to the the
16	disinfo-cloud, and you describe it as sharing
17	findings and information on disinformation
18	related challenges; correct?
19	A. Yes.
20	Q. And it describes a platform, and I
21	guess you're saying this in early 2021; right?
22	A. Mm-hmm.
23	Q. It describes a platform as having
24	1200 members, and has assessed 70 tools; right?
25	Do you know who those members were?

1	It's a lot of members, is this just anyone who
2	wants to access that web page, who seeks and
3	receives authority to do so?
4	A. So as I explained earlier, the
5	members of the disinfo-cloud would include some
6	representatives of government agencies, some
7	developers in the tech sector, and I believe
8	some researchers, as well.
9	Q. And you go on, later in that
10	paragraph, to say: We have established a
11	liaison in Silicon Valley with the purpose of
12	sharing lessons learned and developing two-way
13	communications about foreign disinformation and
14	propaganda with our partners in the technology
15	<pre>industry; correct?</pre>
16	A. Yes.
17	Q. Is that a reference to the the
18	Silicon Valley location we talked about earlier?
19	A. Yes, it is.
20	Q. So that's a reference, essentially,
21	to Mr. Stewart
22	A. Yes, it is.
23	Q right?
24	Is there anything else that falls
25	in that bucket of a two-way liaison with Silicon

1	Valley?
2	A. Could you clarify?
3	Q. Well, your your statement there,
4	about about establishing a liaison in Silicon
5	Valley and developing two-way communications
6	with technology companies, is that referring to
7	anything other than Mr. Stewart being located
8	out there, as we talked about earlier?
9	A. The two-way communications would
10	involve more than just Mr. Stewart, but the
11	liaison position was, of course, developed for
12	that purpose.
13	Q. And that so that liaison you're
14	referring to is, in fact, Mr. Stewart and these
15	remarks?
16	A. Yes.
17	Q. And I can't remember, I think you
18	said he's gone now, he's not at GEC anymore or
19	do you not remember?
20	A. Yes, I believe he's left the GEC.
21	Q. Did someone replaced him out in
22	Silicon Valley, is someone liaising there now?
23	A. There I don't think there is
24	no one from the GEC who is based in Silicon
25	Valley now.

1	Q. Was Mr. Stewart the last one or did
2	someone else did anyone else ever hold that
3	role of the Silicon Valley liaison based out in
4	California?
5	A. I don't think anyone held the role
6	based in California.
7	Q. Other than Mr. Stewart, you mean?
8	Mr. Stewart was based in
9	California, wasn't he? He said that in e-mails.
10	A. Yes. I believe he was the only GEC
11	employee to be based in California.
12	Q. When you're talking about these
13	liaison with tech companies, is part of the
14	purpose there to, you know, partner with tech
15	companies to stop the spread of disinformation
16	online?
17	MR. KIRSCHNER: Objection.
18	A. No. No. The purpose is, as stated
19	here, to share lessons and develop two-way
20	communications. The actions that they take are
21	for the tech companies. The GEC is sharing
22	lessons learned, information about the
23	techniques, the campaigns, the narrative of
24	foreign propaganda and disinformation actors.
25	Q. Is it a purpose of GEC, more

1	generally, to, you know, partner with private
2	tech firms to stop the spread of disinformation
3	on social media?
4	A. It's the purpose of the GEC to
5	engage with the tech industry and other partners
6	to counter propaganda and disinformation. It's
7	not dictating a specific action that they would
8	take.
9	Q. But is it a purpose that you said
10	to counter?
11	A. Yes.
12	Q. Yet earlier described counter can
13	involve a number of things, one thing, counter
14	can be a reputation, for example; right?
15	A. Yes.
16	Q. And your disinformation bulletins
17	refer to difficulties and talk about Lithuania
18	and so forth.
19	Another way of countering
20	disinformation might be, as you say, in some of
21	those bulletins, to attack credibility of the
22	person spreading it, right, that would another
23	way to counter?
24	And the third way to counter would
25	be to stop it from spreading in the first place,

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1	right? Those are three different things?
2	A. That's correct. Those are three
3	different things. You can also raise awareness.
4	You can conduct what's called an inoculation
5	campaign by making people aware of the types of
6	campaigns. The these are all tools in the
7	toolbox.
8	Q. Okay. And as one of those tools
9	that could be in the toolbox to stop the spread?
10	MR. KIRSCHNER: Objection, vague.
11	MR. SAUER: Just asking.
12	MR. KIRSCHNER: Well, I don't know
13	what you're asking.
14	MR. SAUER: Okay.
15	A. Can you clarify what you mean by
16	stop the spread?
17	Q. What does that mean to you, to stop
18	the spread of disinformation on social media?
19	A. It could cover a huge range of
20	things. It could if there's an effective
21	refutation out there, that people read and find
22	compelling, they may stop sharing the propaganda
23	and disinformation that could stop the spread.
24	I could you clarify what you mean by it?
25	MR. SAUER: Why don't you give me

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1 T? 2 Why don't we look at Exhibit 15. 3 (Exhibit No. 15 was marked for 4 identification.) 5 BY MR. SAUER: 6 Q. Have you seen this document before? 7 A. Yes, I believe so. 8 Q. Were you involved in drafting it? 9 A. I was not involved in drafting it. 10 Q. Did you have any input into its 11 formulation? 12 A. I believe I reviewed it, but I 13 didn't I didn't draft it or formulate it. 14 Q. When you reviewed it, did you 15 provide any input or edits or suggestions?
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13 didn't I didn't draft it or formulate it. 14 Q. When you reviewed it, did you
Q. When you reviewed it, did you
provide any input or edits or suggestions?
16 A. I don't recall whether I provided
17 input or suggestions.
Q. And this is titled: Functional
Bureau Strategy for the Global Engagement
20 Center; right?
21 A. Yes.
Q. And it's dated May 17 of 2022, this
23 year?
24 A. Yes.
Q. Who did draft this?

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1	A. I don't know.
2	Q. Is it a and it's on the GEC's
3	website; right?
4	A. Actually, let correct what I just
5	said. If this was released in May 17, 2022, I
6	may not actually have reviewed this version.
7	This is a document that I believe is
8	periodically updated. And just because I was
9	not at the Global Engagement Center in in
10	2022 I don't think that I would have reviewed
11	this. I would have reviewed a previous version,
12	so I didn't notice the date until just now.
13	Q. So this date would have been when
14	you were at the National Defense University?
15	A. Yes. Yes.
16	Q. Okay. Well, can you turn to how
17	about to the it's labeled page 2 of 17, it's
18	really the fourth page of the document.
19	A. Okay.
20	Q. And then there's a paragraph two
21	there that starts in the middle of the page,
22	called: Counter-disinformation technology?
23	A. Yes.
24	Q. And it talks about how technology
25	plays an important role in the problems and

1	solutions of propaganda and disinformation.
2	And the GEC works with government
3	and private sector stakeholders to identify the
4	needs and available tools to counter foreign
5	propaganda and disinformation; correct?
6	A. Yes, that's what it says.
7	Q. Is that all a fair and accurate
8	description of GEC's mission or goals?
9	A. Yes, I believe so.
10	Q. And the next sentence says:
11	Wherever possible, the GEC promotes integration
12	of appropriate technology or technologies to
13	support the mission; do you know what that's
14	talking about?
15	A. With the caveat that I was not
16	with the caveat that I don't believe I was
17	involved in the drafting or approval of this
18	document, I I believe it's a reference to
19	using technology to carry out the GEC's mission
20	of countering propaganda and disinformation by
21	foreign state and non-state actors.
22	Q. And the next sentence says: The
23	GEC also partners with private technology
24	companies to stop the spread of disinformation
25	on social media; correct?

1	A. That's what it says, yes.
2	Q. What's it referring to?
3	MR. KIRSCHNER: Objection,
4	speculative.
5	BY MR. SAUER:
6	Q. How does the GEC partner with
7	social media companies or private technology
8	companies to stop the spread of disinformation
9	on social media?
10	A. I believe that would be through
11	meetings to discuss to share information
12	about the tools and techniques and campaigns and
13	narratives of foreign propaganda and
14	disinformation actors, to deepen the
15	understanding of those campaigns and actors for
16	the technology companies.
17	Q. How does deepening their
18	understanding help stop the spread of
19	disinformation?
20	A. It can help them to identify, for
21	example, coordinated inauthentic activity or to
22	understand what these actors are trying to
23	achieve, to understand the types of narratives
24	they are promoting, to understand the the
25	the actors, the proxies, the tools, for example,

1	as listed in the Pillars of Disinformation
2	report, the elements in the Russian propaganda
3	ecosystem. All of those things are important
4	elements of understanding the problem.
5	Q. And so it promotes it's I
6	think you said it helps them identify certain
7	aspects of the problem and understand aspects of
8	the problem.
9	How, if the search or the
10	technology companies identify and understand
11	those aspects of the problem, does that stop the
12	spread of anything?
13	MR. KIRSCHNER: Objection,
14	speculative.
15	A. Solving a problem has to start with
16	understanding the problem, the elements of the
17	problem. The Global Engagement Center has an
18	important function, it's laid out in its
19	congressional legislation to identify and and
20	track what foreign propaganda and disinformation
21	actors are doing, and releasing, for example, a
22	public report on what Russian propaganda is
23	promoting that doesn't, in and of itself, stop
24	it, but it equips people, it equips, you know,
25	potentially technology companies to better

1	understand it so that they can take whatever
2	actions they would take to to to stop the
3	spread.
4	Q. What actions could technology
5	companies possibly take to stop the spread once
6	they've been educated with this understanding
7	you described?
8	MR. KIRSCHNER: Objection,
9	speculative.
10	A. I I can't speculate about all
11	the things a technology company can do.
12	Q. Well, what do you your document
13	or GEC's document says: We partner with them to
14	stop the spread. You've recounted, in detail,
15	how you educate them and advance their
16	understanding and identification. I don't get
17	the next step, how does it stop the spread?
18	MR. KIRSCHNER: Objection, asked
19	and answered.
20	A. You know, with the caveat that I
21	don't believe I was involved in drafting
22	Q. Sure.
23	A this document, including the
24	specific wording of stop the spread, but, for
25	example, you can label state-owned media as

1	being state-owned media. I know that some
2	social media companies have labeled Russia today
3	as this is a Russian state-owned entity.
4	And by labeling it, and, for
5	example, this is something that's listed in the
6	Pillars of Disinformation report that the GEC
7	released, you can then label that, and as people
8	see that, hopefully they'll be less likely to
9	forward it or share it, and that will help to
10	stop the spread.
11	Q. So applying labels, the in other
12	words, GEC doesn't apply labels to anything on
13	social media; correct?
14	A. No.
15	Q. But it gives information to the
16	tech companies, and then they apply labels to
17	things or they can, if they want to, apply
18	labels to things to help stop the spread; is
19	that a fair characterization?
20	A. In the case that I mentioned, the
21	GEC is not giving the information specifically
22	to tech companies. The Pillars of
23	Disinformation report was a public report that
24	anyone can access, anyone all over the world,
25	including a tech company, can access.

1	Q. Yeah, but that's your example. I'm
2	really talking about what they're saying here in
3	the document, where it talks about partnering
4	with private technology companies, that Russian
5	disinformation report, that was made available
6	to the whole world. That's not a specific
7	partnership with a private technology company;
8	correct?
9	I'm wondering how partnering a
10	private technology companies, and having these
11	meetings, like you're meeting with Twitter in
12	2021, and the other meetings that Mr. Stewart
13	set up and so forth, how do those and you
14	described that those meetings are involved in a
15	kind of information sharing and educational
16	function, how do they stop the spread?
17	A. Just to repeat, they help to deepen
18	the understanding so that a technology company,
19	just like a user, can take action. And they
20	take whatever action they deem is necessary.
21	The Global Engagement Center does not tee up
22	actions for social media companies to take.
23	Q. Did Mr. Dempsey ever tee up an
24	action for a social media company to take?
25	A. I I I don't know about

1	Mr. Dempsey.
2	Q. Alex Dempsey?
3	A. Alex Dempsey.
4	Q. Do you remember him from the 2020
5	e-mail chain we talked about earlier?
6	A. I I don't believe that chain
7	teed up an action. I don't believe it
8	recommended an action.
9	Q. So you don't view that Alex Dempsey
10	chain as teeing up an action; is that fair to
11	say?
12	MR. KIRSCHNER: Objection,
13	mischaracterizing the evidence.
14	MR. SAUER: I'm asking what he
15	how he views the evidence.
16	BY MR. SAUER:
17	Q. You do not view that Alex Dempsey
18	is teeing up an action for social media
19	companies?
20	MR. KIRSCHNER: Objection, lack of
21	foundation, mischaracterizing the evidence.
22	MR. SAUER: I'm asking how he views
23	the evidence.
24	A. Well, did it request a specific
25	action?

1	Q. I'm asking you whether you viewed
2	it as teeing up an action.
3	A. I don't recall that it requested a
4	specific action.
5	Q. So do you view it as not teeing up
6	something for for a specific action?
7	MR. KIRSCHNER: Objection, asked
8	and answered. That's just
9	A. I don't recall it requesting a
10	specific action.
11	Q. Is it your view that if there's a
12	meeting between the GEC and social media
13	platforms, where no specific action is
14	requested, then you haven't teed up anything for
15	action?
16	A. Yes. I don't I don't believe
17	that the GEC requested specific actions of
18	social media companies.
19	Q. Could the GEC give social media
20	companies, for example, a briefing about how
21	content on their platforms is, you know,
22	violative of their platform policies, without
23	requesting removal?
24	MR. KIRSCHNER: Objection, vague.
25	A. The GEC would not brief a social

1	media company on their policies.
2	Q. Would it brief them on information
3	that that would relate to violations of their
4	policies?
5	A. Could you be could you clarify
6	that.
7	Q. Let me ask the question
8	differently.
9	Did anyone associated with the GEC
10	ever flag information or I'm sorry flag
11	content on a social media platform with the
12	intent of alerting them to information that
13	violates their policies?
14	MR. KIRSCHNER: Objection,
15	speculative and vague, ambiguous.
16	A. The only specific example that I
17	recall is the one that I gave you earlier, about
18	a threat to US personnel at a facility abroad.
19	Q. That's the 2018 example you talked
20	about?
21	A. Yeah, I believe it occurred in
22	2018.
23	Q. Do any of the there was a
24	reference in your previous statements to the 70
25	tools on the disinfo-cloud. Did any of those

1 tools relate to to content modulation in	any
<pre>way or, I'm sorry, content moderation?</pre>	
3 A. Right.	
4 Q. Using the definition that you a	nd I
5 agreed to a little while ago, do any of thos	е
6 tools have any relationship with content	
7 moderation?	
8 A. I'm not familiar with the speci	fics
9 of all the tools.	
Q. You don't know what are you	
aware of any tools that do relate to content	
12 moderation?	
13 A. None that I can recall.	
Q. Are you aware of any tools that	
would, if used by a social media platform, m	ake
16 it easier for them to identify content to	
moderate?	
18 MR. KIRSCHNER: Objection, vagu	е,
19 ambiguous, speculative.	
20 A. I don't know enough about the	
21 specifics of how they conduct content modera	tion
to say what tools would or would not be usef	ul.
Q. Some of the tools, at least, ar	е
designed to assess content that's out there	on
social media and try to identify foreign mal	ign

1	narratives within it; right?
2	MR. KIRSCHNER: Objection, lack of
3	foundation.
4	BY MR. SAUER:
5	Q. I thought that's what you said
6	earlier, can you tell me?
7	A. I don't recall. I was giving an
8	example of what might be a tool. I don't recall
9	the specific tools on the platform.
10	Q. So you don't recall the specifics
11	of any tool on that platform; is that right?
12	A. No. I was not an active user of
13	the platform, no.
14	MR. SAUER: Can I have W?
15	I think it's going to be Exhibit 16
16	or 17? 16.
17	(Exhibit No. 16 was marked for
18	identification.)
19	MR. KIRSCHNER: Sorry, you said?
20	MR. SAUER: Yeah, is this I
21	think we're on 16.
22	MR. KIRSCHNER: Yeah, 16.
23	BY MR. SAUER:
24	Q. Do you see this exhibit?
25	A. I do.

1	Q. It's October 17, 2022 remarks to
2	
	the press by Secretary Blinken, the Secretary of
3	State?
4	A. Yes.
5	Q. Were you aware that he made these
6	comments or is this
7	A. Not these specific comments, no.
8	Q. Can you turn to the second page?
9	A. Okay.
10	Q. Second full paragraph, after a
11	paragraph discussing collaborations with
12	Stanford, and partnerships with Silicon Valley
13	and so forth, the Secretary says: We also have
14	to be the ones who are at the table who are
15	helping to shape the rules, the norms, and the
16	standards by which technology is used.
17	Do you know what the Secretary's
18	referring to there?
19	MR. KIRSCHNER: Objection,
20	speculative.
21	BY MR. SAUER:
22	Q. Do you know?
23	A. I I don't know specifically. I
24	believe he's referring to international
25	organizations.

1	Q. Okay. So why don't you what do
2	international organizations do to help shape the
3	rules, the norms, and standards by which
4	technology is used?
5	A. I'm not specifically familiar with,
6	the GEC was not a policy and is not a policy
7	shop. So I'm not specifically familiar with the
8	international organizations that shape the rules
9	and norms.
10	Q. Are you aware of any efforts by the
11	GEC to help shape the rules, the norms, and
12	standards by which technology is used?
13	A. As I said, the GEC is not a a
14	policy shop. I don't it does not have the
15	lead on on policy issues like this.
16	Q. Are you aware of any role of the
17	GEC, at all, on that?
18	A. To the extent that the GEC has a
19	role, I think it would be informing the
20	discussion through insight into the actions of
21	malign propaganda and disinformation actors.
22	It's not a policy office.
23	Q. How about elsewhere in the State
24	Department, what what what State
25	Department office would be involved in helping

1	to shape the rules, the norms, and the standards
2	by which technology is used?
3	MR. KIRSCHNER: Objection,
4	speculative.
5	A. I I believe there's a new
6	office, I don't recall the name. There's a
7	change in this area. I I you would have
8	to ask my colleagues at the department, but I
9	believe there is a new office for
10	specifically for technology policy.
11	Q. Was there a predecessor to that
12	office that you're familiar with?
13	A. I believe that previously there
14	were two offices, and I don't I don't I
15	don't recall the specifics. We were not a
16	policy shop or a direct participant in policy
17	debates.
18	Q. That technology policy office, is
19	it involved in interfacing with social media
20	platforms?
21	MR. KIRSCHNER: Objection,
22	speculative.
23	A. I I I don't know what their
24	interactions are.
25	Q. Can you flip ahead three more

1	pages?
2	Sorry.
3	On the fifth page of the document,
4	do you see there, there's a question from
5	someone called Janelle, where she asks:
6	Stanford is one of the leading institutions to
7	combat misinformation research and pointing out
8	propaganda narratives and how they spread.
9	Are you familiar with Stanford
10	having that role?
11	MR. KIRSCHNER: Objection,
12	speculative.
13	A. I'm familiar with the Stanford I
14	think it's called the Stanford Internet
15	Observatory.
16	Q. Is that the SIO?
17	A. Yes.
18	Q. What do you know about them? How
19	are you familiar with them?
20	A. I'm familiar with them as a a
21	well-known research organization, like the I
22	think there's the Oxford Internet Institute.
23	There are a number of these research entities.
24	Q. Does GEC work with the SIO or the
25	Stanford Internet Observatory in any way?

1	A. I don't recall whether we have a
2	specific interaction with specific
3	partnership with the Stanford Internet
4	Observatory.
5	Q. So you don't know if there's
6	anything in what connection are you familiar
7	with them?
8	A. My general familiarity with the
9	researchers and research in the field.
10	Q. How do you get familiar with the
11	researchers in the field? Do you read the
12	reports or do people in GEC talk about stuff
13	that they're saying? Does GEC rely on their
14	reports in the research that it does or explain
15	that?
16	MR. KIRSCHNER: Objection,
17	ambiguous, vague.
18	MR. SAUER: And compound.
19	MR. KIRSCHNER: And compound.
20	Thank you.
21	THE WITNESS: I I
22 I	BY MR. SAUER:
23	Q. Go ahead.
24	A. I follow the news on and
25	research on issues related to the GEC's mandate.

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1	And I note some of the research institutes that
2	are that are that are producing it.
3	Q. But do you know of any direct
4	involvement between any GEC people and the
5	Stanford Internet Observatory?
6	A. I don't recall whether there was a
7	direct partnership. I simply don't recall.
8	Q. How about the Atlantic Research
9	Council, have you ever heard of them?
10	A. The Atlantic Council.
11	Q. Yeah, Atlantic Council?
12	A. All right.
13	Q. Who are they, exactly?
14	A. It's a Washington, D.Cbased think
15	tank.
16	Q. Is it government funded or
17	privately funded or do you know?
18	A. It's a mix, I believe.
19	Q. Okay. And do you have any does
20	GEC have relationship with them?
21	A. So I'm recused from starting in,
22	I think, early 2019 my wife is an employee at
23	the Atlantic Council, so I recused myself from
24	any Atlantic Council-related discussions in
25	2019. She's at the Eurasia Center at the

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r	
1	Atlantic Council.
2	Q. Okay. How about Graphika, with a
3	K, are you familiar with that?
4	A. Yes, I am familiar with that.
5	Q. What are they, exactly?
6	A. I believe that they're a private
7	sector entity that does research in this area.
8	Q. Are they based in D.C., or where
9	are they based?
10	A. I don't recall where they're based.
11	Q. Does it are you aware of GEC
12	having a relationship with Graphika?
13	A. I don't recall whether GEC has a
14	direct relationship with Graphika.
15	Q. Okay. How are you familiar with
16	them?
17	A. I'm familiar with their general
18	research. I believe they released public
19	reports and I would see those the way I would
20	see reports that the Stanford Internet
21	Observatory would release.
22	Q. Any other any other direct
23	relationship between GEC and and them?
24	A. Not that I recall.
25	Q. Turning back to the document here

1	on the fifth page, the reporter asked the
2	Secretary: How do you envision the cooperation
3	between the State Department and institutions
4	like Stanford, and combatting the spread of
5	propaganda, and how does this fit within the
6	recently released national security strategy;
7	correct?
8	A. Yes.
9	Q. And the Secretary talks about
10	Stanford doing remarkable work on that, and we
11	want to be sure we're benefitting it, because
12	it's a day-to-day battle of combatting
13	misinformation and disinformation; right?
14	A. Right.
15	Q. And then he refers specifically to
16	your unit; right? He says: We have something
17	called the Global Engagement Center that's
18	working on this every single day; correct?
19	A. Yes.
20	Q. And that work is inspired by work
21	that's being done in academia, academia,
22	including here at Stanford, as well as, where
23	appropriate, collaborations; right?
24	A. Yes.
25	Q. So is he talking about your work,

1	the GEC's work, being inspired by work being
2	done at Stanford?
3	MR. KIRSCHNER: Objection,
4	speculative.
5	A. I I believe he's talking about
6	academic research that helps to inform the work
7	of the Global Engagement Center.
8	Q. And are there collab when he
9	talks about appropriate collaborations, are you
10	aware of any collaborations between the GEC and
11	academia?
12	MR. KIRSCHNER: Objection,
13	speculative.
14	BY MR. SAUER:
15	Q. Including, but not limited to,
16	Stanford?
17	A. The GEC engages regularly with
18	researchers on foreign propaganda and
19	disinformation, some of whom are in academic
20	institutions.
21	Q. Including the SIO, Stanford
22	Internet Observatory?
23	A. I believe so, I'm not aware of the
24	specifics of the interactions with all the
25	institutions, but yes, like the SIO.

1	Q. But you believe there are
2	Mr. Kimmage, you don't know specifically whether
3	there's direct interaction with the SIO, but
4	generally it's overdue for the GEC to have
5	direction interactions with research
6	institutions like the SIO?
7	MR. KIRSCHNER: Objection, vague,
8	assumes evidence not in record.
9	BY MR. SAUER:
10	Q. Correct?
11	A. The GEC stays abreast of current
12	research in in the field, and meets
13	periodically with the researchers, yes.
14	Q. Okay. And then the Secretary goes
15	on to say: One of the things we have to do is
16	to make sure that we're using technology,
17	itself, to deal with some of the downsides of
18	technology when it's misused, including when it
19	comes to misinformation and disinformation?
20	A. Mm-hmm.
21	Q. Do you know what he's talking
22	about, how is the State Department using or
23	the GEC, which he's referred to two sentences
24	earlier using technology, itself, to deal
25	with the downsides of technology when it comes

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1	to minim formation and dinim formation 0
1	to misinformation and disinformation?
2	MR. KIRSCHNER: Objection,
3	speculative.
4	A. So I don't know, specifically, what
5	the Secretary is referring to, here, but the
6	Technology Engagement Team at the Global
7	Engagement Center engages with people who are
8	developing tools that would help to identify and
9	counter propaganda disinformation. I believe
10	those are the types of engagements that he's
11	referring to.
12	MR. KIRSCHNER: Counsel, do you
13	know how much longer?
14	MR. SAUER: Why don't we take a
15	five-minute break.
16	MR. KIRSCHNER: Okay.
17	MR. SAUER: And I will use that
18	time to see whether and to what extent I have
19	more to go over.
20	THE VIDEOGRAPHER: The time is 4:19
21	p.m. We're off the record.
22	(Recess.)
23	THE VIDEOGRAPHER: The time is 4:32
24	p.m. We're back on the record. Please proceed.
25	MR. SAUER: We have plaintiffs
	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1

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1	have no further questions for this witness at
2	the time.
3	MR. KIRSCHNER: The defendants have
4	no questions, either. And we believe that this
5	is closed. And this is Mr. Kimmage's
6	completion of Mr. Kimmage's deposition for this
7	case.
8	MR. SAUER: His first deposition
9	for this case.
10	MR. KIRSCHNER: No, this is the
11	close of his deposition, and that we would
12	object to any other further reopening of his
13	deposition.
14	MR. SAUER: If that issue ever
15	comes up, I'm sure we'll take it up at that
16	time. So is that the end?
17	THE VIDEOGRAPHER: With that
18	MR. KIRSCHNER: Before before
19	the close of it, we would like to read and
20	review the transcript for him to and sign
21	before
22	MR. SAUER: Sure. And we're going
23	to be asking for expedited, if that's available.
24	I know I'd asked for Monday, I don't know if
25	that's feasible.

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1	THE REPORTER: It's fine.
2	MR. SAUER: Thanks.
3	THE VIDEOGRAPHER: Okay. And with
4	that, that concludes the deposition of Daniel
5	Kimmage. The time is 4:33 p.m. We're off the
6	record.
7	(Signature having not been waived,
8	the deposition of DANIEL KIMMAGE was concluded
9	at 4:33 p.m.)
10	ACKNOWLEDGMENT OF DEPONENT
11	I, DANIEL KIMMAGE, do hereby acknowledge
12	that I have read and examined the foregoing
13	testimony, and the same is a true, correct and
14	complete transcription of the testimony given by
15	me and any corrections appear on the attached
16	Errata sheet signed by me.
17	
18	
19	(DATE) (SIGNATURE)
20	
21	
22	
23	
24	
25	
1	

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1	CERTIFICATE OF SHORTHAND REPORTER
2	I, Cassandra E. Ellis, Registered
3	Professional Reporter, the officer before whom the
4	foregoing proceedings were taken, do hereby
5	certify that the foregoing transcript is a true
6	and correct record of the proceedings; that said
7	proceedings were taken by me stenographically and
8	thereafter reduced to typewriting under my
9	supervision; and that I am neither counsel for,
10	related to, nor employed by any of the parties to
11	this case and have no interest, financial or
12	otherwise, in its outcome.
13	IN WITNESS WHEREOF, I have hereunto set
14	my hand this 14th day of November 2022.
15	
16	
17	
18	CASSANDRA E. ELLIS, CSR-HI, CSR-VA, CCR-WA, RPR,
19	CRR
20	REALTIME SYSTEMS ADMINISTRATOR
21	NOTARY PUBLIC
22	
23	
24	
25	

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1	LEXITAS LEGAL
2	
3	November 14, 2022
4	
5	ADAM KIRSCHNER, ESQUIRE
6	DEPARTMENT OF JUSTICE 1100 L STREET, NORTHWEST
7	WASHINGTON, D.C. 20530
8	IN RE: STATE OF MISSOURI, et al. v. JOSEPH R. BIDEN, JR., et al.
9	
10	Dear ADAM KIRSCHNER:
11	Please find enclosed your copies of the deposition of
12	DANIEL KIMMAGE taken on November 10, 2022 in the
13	above-referenced case. Also enclosed is the original
14	signature page and errata sheets.
15	Please have the witness read your copy of the
16	transcript, indicate any changes and/or corrections
17	desired on the errata sheets, and sign the signature
18	page before a notary public.
19	Please return the errata sheets and notarized
20	signature page within 30 days to our office at 1608
21	Locust Street, Kansas City, MO 64108 for filing.
22	Sincerely,
23	
24	Lexitas Legal
25	Enclosures

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1	ERRATA SHEET
2	Witness Name: DANIEL KIMMAGE
3	Case Name: STATE OF MISSOURI, et al. v. JOSEPH R. BIDEN, JR., et al.
4	Date Taken: NOVEMBER 10, 2022
5	Page # Line #
6	Should read:
7	Reason for change:
8	
9	Page # Line #
10	Should read:
11	Reason for change:
12	
13	Page # Line #
14	Should read:
15	Reason for change:
16	
17	Page # Line #
18	Should read:
19	Reason for change:
20	
21	Page # Line #
22	Should read:
23	Reason for change:
24	
25	Witness Signature:

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1	STATE OF)
2	
3	COUNTY OF)
4	
5	I, DANIEL KIMMAGE, do hereby certify:
6	That I have read the foregoing deposition;
7	That I have made such changes in form
8	and/or substance to the within deposition as might
9	be necessary to render the same true and correct;
10	That having made such changes thereon, I
11	hereby subscribe my name to the deposition.
12	I declare under penalty of perjury that the
13	foregoing is true and correct.
14	Executed this day of,
15	20, at
16	
17	
18	
19	
20	DANIEL KIMMAGE
21	
22	
23	NOTARY PUBLIC
24	My Commission Expires:
25	

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